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115862

THE FIRESTONE TIRE & RUBBER COMPANY

POTTSTOWN, PENNSYLVANIA 19464

REPORT TO DER ON

HYDROGEOLOGY OF THE EXISTING LANDFILL, PROPOSED LANDFILL, AND SLUDGE LAGOONS

12/1/75

PREPARED BY

MARTIN AND MARTIN, INCORPORATED
149 E. Queen Street
Chambersburg, Pennsylvania 17201

ENGINEER

AND

TODD GIDDINGS & ASSOCIATES
140 W. Fairmount Ave.
State College, Pennsylvania 16801

HYDROGEOLOGISTS

SEPTEMBER, 1975

REVISED OCTOBER, 1975

martin and martin, incorporated

149 east queen street • chambersburg, pennsylvania • 17201

(717) 264-6759

RICHARD martin BODNER, P.E.
CHARLES martin SIOBERG, Assoc. A.I.P.

IN NEW YORK:
R. martin BODNER ASSOCIATES
pleasant valley, new york
(914) 635-2283

October 2, 1975

Mr. Wayne Lynn
Region I Solid Waste Coordinator
1875 New Hope Street
Norristown, Pa. 19401

Dear Mr. Lynn:

RE: Firestone Tire & Rubber Co.
Our File: 75-165

We are transmitting herewith four (4) copies of our analysis of the Hydrogeologic conditions at the subject site as they relate to the existing landfill and sludge lagoons, and the proposed landfill.

As you know, it is Firestone's desire to have the Department permit the expansion of the landfill without the installation of a liner.

We respectfully request that your staff review this report prior to our October 14th meeting so that we may discuss the concepts developed herein in detail.

Very truly yours,

MARTIN AND MARTIN, INCORPORATED

RM Bodner

Richard M. Bodner, P.E.

RMB:jk

Enclosures

cc: Mr. Roman Zaharchuk
Mr. Todd Giddings

I. FLUCTUATIONS IN MONITORING WELL PERFORMANCE

There are three (3) existing monitoring wells along the south-westerly perimeter of the existing landfill which have shown significant fluctuations in BOD and iron, as well as other chemical parameters. The construction data on the wells is as follows:

INITIAL MONITORING WELLS

WELL #1 - EL-122.6

0' to 10' Clay
10' to 18' Sand and Gravel and Water
18' to 21' Shale
23'9" of Casing
21'9" of Hole
Water level - 1 hr. after finish time - 10'6" from grade level.

WELL #2 - EL-125.2

0' to 5' Black River Dirt
5' to 15' Yellow Clay
15' to 20' River Gravel and Water
20' to 25' Red Shale
27' of Casing
25' of Hole
Water level - 17 hrs. after finish - 11'9" from grade level.

WELL #3 - EL-132.6

0' to 15' Red Clay
15' to 20' Brown Clay
20' to 30' Clay and Gravel mixed and Water
30' to 34' Red Shale
36' of Casing
34' of Hole
Water level - 18 hrs. after finish - 30'8" from grade level.

These wells were installed in 1971 and are constructed of 4 inch diameter steel casing.

The bottom 10 feet of each well casing is perforated with 1/8" perforations on 1 foot centers at 6" diagonal. Water levels in wells 1 and 3 were approximately 5 feet and 13 feet respectively below top of casing during selected measurements in the summer of 1975. The elevation of perforations in those wells is approximately 11 feet 9 inches below casing top in well 1 and 26 feet below casing top in well 3.

Therefore, the upper several feet of water in the monitoring wells is stagnant for significant periods of time. The wells were not responsive to fluctuations in ground water levels recorded in the newly constructed wells, those fluctuations being caused by a storm which raised the water level in the Schuylkill River and the monitoring wells. A possible explanation of the fluctuations of iron and BOD is the stagnant water, together with iron flakes from the casings, resulting in a significant seasonal variation in the number of bacteriological organisms. This variation is possibly related to temperature. These wells are not closely related to the ground-water flow under the landfill and should be abandoned as monitoring points and replaced.

II. LANDFILL HYDROGEOLOGY

Statement of Problem

It is recognized that the proposed expansion of the landfill site cannot utilize a natural-renovation-of-leachate design concept due to the soil conditions, shallow water-table conditions, and the nature of the waste. This conclusion was reached as a result of a field inspection of the existing landfill site and method of operation, as a result of a review of existing site data on the soil and ground-water conditions, the logging of backhoe pits, and a definitive statement to this affect by the Department of Environmental Reosurces in their letter to Firestone dated May 29, 1975. An alternative to the natural renovation site design concept is to control the flow of leachate and, when necessary, to extract it from the site for treatment and discharge.

A hydrogeologic field study program was designed and executed to evaluate to the bedrock, soil, and ground-water conditions which would relate to the design of a landfill site utilizing leachate flow control in order to prevent ground-water contamination.

There are two basic means of achieving leachate flow control:

1. Utilize an impermeable, membrane liner to isolate the landfill site from the ground-water flow system.

2. Design the landfill site so that the flow of leachate can be controlled and the natural ground-water flow can be manipulated to prevent contamination, and provide for leachate extraction, if necessary.

The technique of flow manipulation was investigated first because: (1) The expenses of membrane liners is significantly greater than is flow manipulation, (2) The existing landfill and sludge lagoon situations cannot be rectified by a membrane liner.

With / Bridge communications between the two systems

Shallow Syst. River Controlled

There are two interrelated and interconnected ground-water flow systems at the site. The first flow system consists of ground-water in the alluvial silts, sands, and gravels which were deposited by the river to a depth of about 20-25 feet below ground level. Water table levels in this material correlate closely with the river stage. The second ground-water flow system is located within the shale and siltstone bedrock underlying the alluvium at the site. Flow in this system occurs along joints and bedding planes in the bedrock and is strongly affected by the pumpage of plant water supply wells which are located adjacent to the site.

2nd Fracture Joint Control

Field Investigation

The area of study was the existing landfill site, the four unlined sludge lagoons, and the area between these two locations, which is proposed for expansion of the landfill (See attached map). The first phase of the field study consisted of the excavation of 6 backhoe pits. These pits provided information on the thickness and texture of the alluvium, and the depth to the water table in this shallow ground water flow system. This preliminary data indicated that, should it be necessary, it would be feasible to control the flow of ground-water in the alluvium by techniques such as a slurry wall (ground-water dam) or interceptor trenches (ground-water drain).

Man. & Control of shallow system feasible

The next phase of the field investigation was concerned with the deep ground-water flow system within the bedrock underlying the alluvium. Manipulation and control of ground-water flow within this system would be much more expensive and difficult to achieve due to the depths involved and the permeability of the rock. Thus the control of flow within the deep, bedrock flow system is the limiting technical and economic aspect of the proposed flow system manipulation concept for the design of a landfill which will prevent ground-water contamination. Another important aspect of the field investigation

Deep system Limit Technical Feasibility & Cost

Remedial Assessment? Any data as is from this work on water quality.

was to determine if a flow system manipulation design could also incorporate remedial measures which would abate any present contamination and prevent any future contamination of ground water from the existing landfill site and the existing unlined lagoons.

To evaluate the deep, bedrock flow system conditions, four observation wells were drilled into the bedrock in order to monitor water-table levels and to evaluate gradients within this flow system. Three of the observation wells were drilled 119 feet deep. and the fourth well was drilled 125 feet deep. Yields of these wells, as observed by blowing them with the drill rig for about one half hour, ranged from 12 gallons per minute to 42 gallons per minute. Each of the wells was cased at least 10 feet into sound bedrock and then this casing was grouted for its entire depth into rock to prevent any short circuit of flow from the shallow ground-water flow system into the open, bedrock well bore.

Water-table levels were measured in 9 plant water supply wells, the four observation wells (drilled and grouted into the bedrock flow system), and in shallow landfill monitoring wells (in the shallow alluvial flow system).

Water levels were measured while all the plant wells were pumping, and also while 7 of the plant wells were not in production for a 2 week period. These repeated water-level measurements provided information on ground-water flow directions, interferences between plant supply wells, and the extent of the composite cone of depression of the plant supply wells. Water levels measured in the shallow landfill monitoring wells were to provide information on the response of the shallow, alluvial flow system to changes in river stage and also provide information relating to the degree of inter-connection of flow systems, as evidenced by the degree of correlation in changes in water levels within wells in each of the flow systems.

During the period of shut-down of most of the plant supply wells, a pumping test was conducted on well No. 6. This well was selected because it has the highest production, 250 gallons per minute, of any of the plant supply wells. Water levels observed during the pumping test indicated the degree of interference between Well 6 and adjacent plant wells, and also indicated the extent of the cone of depression of Well 6. Plant supply Wells 4 and 7 remained in continuous production throughout the two week period

when the rest of the plant supply wells were shut down. Water levels measured during this period indicated the rate of recovery of the rest of the well field, and also the amount of effect that pumpage from Wells 4 and 7 has on the rest of the well field.

Since both the shallow, alluvial flow system and the deep, bedrock flow system are interconnected and are also directly connected to the Schuylkill River, data on the stage of the river were obtained during the field investigation. This river stage data was measured by plant personnel at 5:30 p.m. each day, from a staff gauge located adjacent to the inlet of the river pumping station.

Data Analysis

Water levels which were measured in the plant wells, in the observation wells, (deep flow system), and in the landfill monitoring wells (shallow flow system) were tabulated and were corrected to elevations (mean sea level datum). These water-table elevations, for various days during the period of field investigation, were then plotted on a map of the plant site area. The configuration of the water table and flow directions could then be observed on this map for both pumping and non-pumping conditions. A graph was also constructed

to examine the correlation of the river stage and water levels in the observation wells and monitoring wells. Data on the construction of the plant wells was also reviewed and current pumping rates for each of these wells was tabulated.

Data on the bedrock underlying the site, which is the Brunswick Formation, was reviewed in Ground Water Report W22. Two interbeds of the Lockatong Formation, which traverse the plant site, were replotted at a larger scale in order to examine their effect on the interferences between plant wells and on ground-water flow directions under the site.

VI. CONCLUSIONS

1. As expected, the hydraulic properties of the bedrock aquifer underlying the site are extremely anisotropic (directionally variable).

2. Interferences between plant supply wells are extremely variable, due to the ground water dam effect of the interbeds of the Lockatong Formation (See attached maps).

3. During a pumping test on Well 6, the drawdown observed in plant Well 9 was more than ten times the drawdown observed in plant Well 8, an equal distance from pumping Well 6. This was because

the cone of depression around Well 6 extended along strike (the outcrop direction of the Brunswick Formation) a greater distance along bedding plane fractures which permitted easier flow of ground-water. Well 8, located across strike from Well 6, did not experience as strong an influence of pumping due to the resistance to ground-water flow across bedding, (perpendicular to strike).

4. The degree of correlation of the changes in water levels in the observation wells with changes in pumpage in the pump wells indicated that the composite cone of depression of the plant wells extends under the unlined lagoon area, the proposed landfill expansion area and the present landfill site area.

5. As shown on the attached distance-drawdown graph, the cone of depression during a pumping test on plant Well 6 extended along strike, affected plant Well 9, and reached the Schuylkill River. Water-table elevations in plant Well 8, and observation Wells 3 and 4 plotted above the base line due to their location across strike from plant well 6.

6. Water table elevations in observation wells 1 and 2 plotted closer to the base line due to their location along strike from Well 6.

7. In areas adjacent to the river, and at some distance from the plant supply wells, the deep, bedrock flow system also responds to changes in river stage due to its interconnection with the shallow, alluvial flow system and possibly due to a direct connection through outcrops in the river bed.

8. The shallow ground-water flow system in the river alluvium responds to changes in river stage and provides recharge to the deep bedrock flow system.

9. Any leachate emanating from the present or proposed landfill sites and any seepage from the existing unlined lagoons will first move into the shallow, alluvial flow system. Flow within this system can be controlled and any contaminated ground water could be extracted, if the lateral flow showed significant movement towards the river.

10. Any leachate or lagoon leakage which might move more vertically through the alluvium and into the underlying bedrock will be influenced by the pumpage of the plant wells. If contaminated water enters the bedrock flow system, it will be ultimately removed through the plant wells, having moved down the cone of depression as a result of the continuous pumpage of these wells.

11. Ground-water flow in both the alluvial and bedrock flow systems can be controlled beneath and adjacent to the existing landfill site should it be necessary to extract any leachate contaminated ground-water or to prevent the contamination of ground-water adjacent to the site.

12. The landfill can be expanded toward the unlined lagoons and can be operated without a membrane liner by relying on control of both the alluvial and bedrock flow systems in that area. Should leachate-contaminated ground-water be detected in the future from this expansion site area, it would be extracted from either flow system by pumpage or other means. The system should include monitoring, but DER will very likely require a backup design showing the extraction procedure.

13. The four, existing unlined lagoons are located within the cone of depression of the plant supply wells and hence if there was any seepage into the bedrock flow system it will ultimately be extracted through the composite cone of depression. Should it become necessary to extract ground water due to seepage into the alluvial flow system, it could be accomplished by pumpage from peripheral drains.

14. The hydrogeologic conditions at the existing landfill site, at the proposed landfill expansion area, and at the unlined lagoons are such that abatement and prevention of ground-water contamination can be accomplished by manipulation and control of the alluvial and bedrock flow systems if such contamination becomes a problem, without the need for a membrane liner either under the landfill or the lagoons.

On what basis are you saying they aren't occurring? Where's the data to suggest contamination

15. There are several alternative methods for manipulation and control of the shallow, alluvial flow system in order to prevent the contamination of ground water by leachate and to provide a means of leachate extraction if and when such control becomes necessary. Including control of leachate from the sludge lagoons, some 4,000 lineal feet of cut-off trench will be required. These techniques are as follows:

A. Techniques involving the construction of a ground-water dam:

1. A subsurface slurry-wall constructed by placing bentonite-clay mixture in a trench extending into the alluvium.

2. Injection of cement grout in the alluvium to seal off a liner zone around the site.

B. Techniques involving the interception of contaminated ground water flow:

1. A trench containing a perforated pipe within a gravel pack at the bottom and connected to sumps for withdrawing contaminated ground-water from the alluvium.

2. A line of well points driven into the alluvium at a suitable spacing for continuous pumpage of ground water from around the site.

16. In order to minimize the quantity of water which moves laterally in the shallow alluvial flow system, the wet area between the proposed fill area and the sludge lagoons should be drained. Additionally, the storm water drainage pipe south of the resin plant should be extended beyond the subject area.

Run-off control to inhibit infiltration to Landfill

17. The quantity of leachate generated, and therefore the rate of flow of the contaminated shallow gorund-water from the landfill to the river will depend on the amount of surface water entering the fill. Fortunately, most of the contributary drainage shed is roofs and parking lots, therefore, Firestone can institute run-off control measures to minimize the flow of water onto and the infiltration of water through the refuse. This should allow Firestone to monitor the lateral flow of leachate from the subject areas as the initial management program.

12/13/74

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF SANITARY ENGINEERING
AND
BUREAU OF HOUSING AND ENVIRONMENTAL CONTROL

GROUND WATER MODULE
PHASE I

Facility Identification

Name Firestone Tire & Rubber Co. Reviewed by _____ Date _____

Municipality Lower Pottsgrove Township Recommend approval _____ Disapproval _____

County Montgomery Conditions _____

Location

I. The name and date of the latest edition of the 7.5 minute topographic map covering the area is Phoenixville, 1968.

A. Is the required copy or, if not available, a topographic map of equivalent scale attached? (Y) N

B. Is the proposed and/or existing facility (impoundments, boundaries of spray irrigation fields including a 200 foot border, or boundaries of sanitary landfills) shown on the 7.5 minute topographic map? (Y) N

C. Supply location of the facility, measured to the nearest 0.05 inch North and West from the southeast corner of the 7.5 minute topographic map. Express location in latitude and longitude also. (Degrees, minutes and seconds)

1. Spray irrigation and sanitary landfills: Give the location of the center of the area designated to receive waste.

North 18.50; West 15.65 Latitude 40°13'34" Longitude 75°36'44"

2. Impoundments: Locate a point at the center of each impoundment. (N/A)

#____ North __.__; West __.__ Latitude _____ Longitude _____
#____ North __.__; West __.__ Latitude _____ Longitude _____
#____ North __.__; West __.__ Latitude _____ Longitude _____
#____ North __.__; West __.__ Latitude _____ Longitude _____

3. Other #____North __.__; West __.__ Latitude _____ Longitude _____ (N/A)

II. Is the required large scale map showing the facility attached? (Y) N

A. Is the large scale topographic map drawn to the following minimum scales?

1. Spray irrigation: scale 1" = 50' Contour interval 2' — Y N (NA)

2. All other: scale 1" - 200' Contour interval 5' — (Y) N NA

B. Is the following information plotted on the large scale map:

1. Location of soils/geologic/and hydrologic test pits, wells or borings? — (Y) N

2. The distribution system and nozzle locations of spray irrigation systems. — Y N (NA)

III. All of the following which occur within the site boundaries (for spray irrigation include a 200 foot buffer zone) must be plotted on the large scale map. All of the following outside of the site boundaries, but within 1/4 mile of the boundaries, must be plotted on the 7.5 minute topographic map.

Check the appropriate space:

	7.5 min. topo map	large scale map	not applicable
A. Water wells	X		
B. Springs			X
C. Swamps			X
D. Streams	X		
E. Public water supplies			X
F. Other bodies of water (Lagoon)	X		
G. Sinkholes			X
H. Underground and/or surface mines			X
I. Mine pool discharge points			X
J. Mining spoil piles or mine dumps			X
K. Quarries			X
L. Sand and gravel pits			X
M. Gas and oil wells			X
N. Diversion ditches			X
O. All water quality monitoring points		X	
P. Occupied dwellings			X
Q. Roads		X	
R. Power lines		X	
S. Pipelines			X
T. Public buildings			X

IV. Check the topographic feature which best describes the setting for the facility.

A. Alluvial Terraces	X	H. Pediment	____
B. Hillside (slope)	____	I. Valley flat	____
C. Sinkhole	____	J. Hillside drainageway	____
D. Swamp or marsh	____	K. Abandoned canal	____
E. Hilltop	____	L. Quarry	____
F. Local depression	____	M. Strip pit	____
G. Upland flat	____	N. Sand or gravel pit	____
		O. Other (explain)	____

Impoundments

Answer the following questions for impoundments only: (N/A)

1. Will sides and bottom of the impoundment be made impervious? Y N

   Briefly describe or explain _____

2. Will the surrounding area be graded or diked to prevent surface water from entering the impoundment? Y N

   Briefly describe or explain _____

3. Will the sides be constructed to maintain a two (2) foot free-board, and be protected against wave action? Y N

GROUND WATER MODULE
PHASE I

Climatology and Flooding

I. Will this be an all-season operation? (Y) N

A. If seasonal, include operating dates: _____ to _____.

II. Precipitation data: For a sanitary landfill requiring collection and treatment of leachate complete 1, 2, 3, 5 & 6. For spray irrigation complete 3, 4, 5 & 6. For impoundments complete 2, 5 & 6. (N/A)

1. Maximum precipitation — inches/yr._____
2. Average precipitation — inches/yr._____
3. Maximum monthly precipitation — Month_____ in._____
4. Minimum monthly precipitation — Month_____ in._____
5. Station of record _____
6. Length of historical record _____.

III. Surface Evaporation Data Required for Impoundments Only. (N/A)

1. Average surface evaporation — inches/yr._____
2. Station of record _____
3. Length of historical record _____.

IV. Flooding Frequency

A. Will all or part of the site be inundated? (check one)

____ once in 5 years or more
____ once in 10 years
____ once in 25 years
____ once in 50 years
X once in 100 years
____ never

B. Source of flooding information National Climatic Center, Ashville, North Carolina

GROUND WATER MODULE
PHASE I

Soils

I. List each of the soil series and phases present on the site.

Soil Series - Phase

A. MeB - Made land, shale and sandstone materials, sloping.

B. Mb - Made land, land fill and sediment basin

C. Ru - Rowland silt loam, coal overwash

D. _____

E. _____

II. Is the required copy of the U.S.D.A. Soil Conservation Service soils map for the area showing site boundaries attached? (Y) N

III. Have borings or test pits been made to describe soils and determine their depth? (Y) N

A. Are their locations shown on both the large scale map and the soils map? (Y) N

B. The minimum thickness of soil to horizon(s) containing 60% or more coarse fragments is 120 inches.

1. How was soil thickness determined? Measurement in test pits

C. Are the required pit or boring descriptions (by horizon) attached? (Y) N

IV. The percolation rates for the soils are: (Complete where applicable. For example: spray irrigation, tile fields, seepage beds, etc.)

			Soil Series
A.	Variable	inches/hour	MeB
B.	Variable	inches/hour	Mb
C.	0.63 - 6.3	inches/hour	Ru
D.		inches/hour	
E.		inches/hour	

V. How were the percolation rates determined? Soil Survey of Montgomery County, Pennsylvania

A. If percolation tests were run, are all percolation test holes shown on the soils map? Y N

VI. What is the maximum slope at the proposed site? 10 percent.

VII. What is the shallowest depth from the surface to mottling? 60 inches.

A. How was the above determined? Measurement in test pits

VIII. Is there a fragipan present? Y (N)

IX. What is the shallowest depth to the fragipan? _____ inches.

A. How was the above determined? _____

Name and address of the soil scientist supplying the above data:

Name Sheldon Ray Prager, P.E.

Street Sanders & Thomas, Inc., Griffith Towers Building

City and State Pottstown, Pa. Zip 19464

Phone number (include area code) 215-326-4600

Sources of Data:

Soil Survey of Montgomery County, Pennsylvania

December 12, 1979

Mr. P. J. Lamp'l, Chief
Environmental Emergency Branch
US EPA, Region III
Sixth and Walnut Streets
Philadelphia, Pa. 19106

Dear Mr. Lamp'l:

Enclosed is the completed questionnaire on the sewer line leak to the Schuylkill River that I reported by telephone to Mr. E. Lindhult of your office on November 28, 1979.

We understand and have and will continue to comply with our reporting obligations as demonstrated in this case. However, we wish to emphasize that the leak to the river did not constitute a "discharge of oil or hazardous materials in harmful quantities" as set forth in the first paragraph on the first page of the attached questionnaire. The total flow from the Firestone complex which normally goes to the Boro of Pottstown Waste Treating Plant is in compliance with 40 CFR, Part 117, Determination of Reportable Quantities for Hazardous Substances, effective September 28, 1979, a regulation covering spills and discharges to natural waters. The leak to the river was an unknown but small fraction of the total flow from the Firestone complex.

Very truly yours,

J. A. King, Coordinator
Special Projects

JAK/rm

Enclosure

Bl CC: Mr. T. C. Walker
Mr. H. E. Powell
Mr. J. J. McCoskey

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS

PHILADELPHIA, PENNSYLVANIA 19106

RECEIVED

DEC 7 1979

Firestone Tire and Rubber
PO Box 699
Pottstown, PA 19464

Certified No. 2555935

December 3, 1979

Re: PA-79-856, 11-28-79, Pottstown, PA

Gentlemen:

This office has received notification that your facility discharged oil or hazardous materials in harmful quantities in violation of Section 311(b)(3) of the Federal Water Pollution Control Act Amendments of 1972, 33 U.S.C. 1321(b)(3) as referenced above. You are hereby requested to submit to EPA the following information:

(a) Time and date of discharge: FIRST OBSERVED 8:30 AM, NOV. 28, 1979 (SEE ATTACHED MEMO)

(b) Material(s) discharged: SANITARY SEWAGE AND PROCESS WASTEWATER FROM PRIMARY TREATMENT FROM PVC PLANT

(c) Description of the vehicle or facility from which the material was discharged (i.e., pipeline, tank, well, etc.): PIPELINE

(d) Name and address of the owner/operator of the vehicle or facility described above in (c): LOWER POTTSGROVE TOWNSHIP, PO BOX 11, SANATOGA PA 19464

(e) Name and address of the operator of the vehicle or facility described above in (c) and, if different from (d) above, describe the relationship between the owner and operator (i.e., employee, subcontractor, lessee, etc.):

SAME AS IN (d).

AR100052

(f) Location of the discharge, including county and state:

UNDER ROUTE 422 BYPASS BRIDGE ACROSS SCHUYLKILL RIVER, LOWER POTTSGROVE TOWNSHIP, MONTGOMERY CO., PA.

(g) Quantity of material discharged from the facility or vehicle.

UNKNOWN (SEE ATTACHED MEMO)

(h) Did the material reach any water or sewer (Yes or No): YES

(1) If Yes, describe the first water reached and the location of this water: SCHUYLKILL RIVER

(2) State the quantity of material reaching the water described above in (h)(1): SEE (g) ABOVE

(3) State the quantity of material reaching the shoreline of the water described above in (1) which did not reach the water: NONE

(4) Was the water described above in (h)(1), at the time of the spill, a tributary of, or physically connected to, any part or tributary of a riverine, hydrological or creek system? (Yes or No): YES

(5) If the answer to (4) is Yes, describe or name the waterways to which the waters in (h)(1) connect or flow:

DELAWARE RIVER BASIN

(6) If the answer to (4) is No, does the water described above in (h)(1) periodically connect with or flow into any tributary or part of any riverine, hydrological or creek system? If Yes, describe the flow and connection:

NOT APPLICABLE

(i) Did the material cause any film, sheen, discoloration or irridescent appearance on the adjoining shorelines of, or surface of, any water described above in (3), (4), (5), or (6)? If Yes, describe: NO

(j) Did the material cause any sludge or emulsion to be deposited on the adjoining shorelines of, or beneath the surface of, the waters described above in (3), (4), (5), or (6)? If Yes, describe: NO

(k) Did the discharge violate any applicable water quality standards, e.g., NPDES or State Standards? If Yes, describe: YES NPDES + CLEAN STREAMS LAW OF PA.

(l) Date and time of discovery that the discharge was reaching the waterway: 8:30 AM NOV. 28, 1979

(m) Describe in detail what actually caused the discharge: DEFECTIVE BOLT HOLDING DOWN COVER OF MANHOLE IN SEWER LINE.

(n) Describe any observed damage to animal life or vegetation: NONE

(o) Describe steps taken to contain and clean up the spilled material and mitigate environmental damage: IMPOSSIBLE TO CONTAIN BECAUSE OF STORMWATER RUNOFF; NO APPARENT CLEAN-UP NECESSARY; NO APPARENT ENVIRONMENTAL DAMAGE.

(p) List the federal and state agencies, if any, to which the owner or operator reported the discharge. Show the agency, its location, the date and time of notification of the official contacted: SEE ATTACHED MEMO

(q) List the State and local officials who were on scene at the spill during or after cleanup: NONE

(r) List the names and addresses of persons believed to have knowledge of the facts surrounding this incident: J.A. KING + R.C. SCHROLL, BOTH OF FIRESTONE

(s) List the type of oil and total storage capacities at the facility for any oil related products. Describe the storage tanks at the facility, e.g., above ground, underground, etc.: OMITTED ON INSTRUCTION OF MR J. HARSCH, EPA, REG III

(t) Describe action taken or proposed to prevent a recurrence of this type of spill. CONTAIN PRESENT SURVEILLANCE

(u) Does the facility have a Spill Prevention Control and Countermeasures (SPCC) Plan certified and implemented in accordance with 40 CFR 112? YES

(v) List any other information you wish to bring to the attention of the federal government: SEE ATTACHED MEMO

The above information should be mailed to:

U.S. Environmental Protection Agency
Region III
Environmental Emergency Branch (3SA30)
Sixth & Walnut Streets
Philadelphia, Pennsylvania 19106

If your company cannot answer this letter by December 18, 1979 or if there are any questions on this matter, you may call John Harsch at 215-597- 9898.

Sincerely yours,

for Howard J. Lamp'l, Chief
Environmental Emergency Branch

Joseph A. King
I hereby certify the above to be true and accurate to the best of my knowledge.
COORDINATOR, SPECIAL PROJECTS

DEPARTMENT OF TRANSPORTATION
UNITED STATES COAST GUARD

MAILING ADDRESS: (mep)
COMMANDER
THIRD COAST GUARD DISTRICT
GOVERNORS ISLAND
NEW YORK, N.Y. 10004
(212) 264-7240

03-167/77mep
PA 76-575
MMSD 1136-77
1 September 1977

Mr. W. W. Madden
Firestone Plastics Company
P.O. Box 699
Pottstown, Pa 19464

RECEIVED
SEP 8 1977
W. W. MADDEN

Re: Discharge of oil
from the Firestone Plactic Company
2 December 1976

Dear Mr. Madden:

This will acknowledge receipt of your check #P159102 in the amount of $100.00 for payment in full of the penalty incurred by the Firestone Plactic Company, for violation of Section 311(b)(3) of the Federal Water Pollution Control Act (hereafter referred to as the Act) on 2 December 1976.

In the event that the Federal Government had to accomplish a cleanup, and reimbursement did not follow, remittance of the above civil penalty would not preclude the initiation of action to recover the cost to the Federal government of the cleanup.

Further, this does not preclude penalty action for any violation of Coast Guard Pollution Prevention Regulations promulgated under authority of Section 311(j) of the Act or penalties, under authority of Section 311(j)(2) of the Act for failure to properly remove the discharged oil. This action does not preclude penalty action by the U S. Environmental Protection Agency (EPA) for any failure to adhere to EPA Pollution Prevention Regulations, pursuant to Section 311(j) of the Act.

Sincerely,

J. M. MULLEN
Commander, U. S. Coast Guard
Chief, Marine Environmental Protection Branch
By direction of the District Commander

REPORT SPILLS
800-424-8802
OIL & HAZARDOUS SUBSTANCES

9/9/77 pc ea HSNewman, TCWalker, GWWamsley,
RCSchroll(Engr), TIVeiock,
HIOberlander, SWString,
JRLaman(2)

AR100056

Department of Environmental Resources

1875 New Hope Street
Norristown, PA 19401
215 631-2415

August 2, 1982

Occidental Chemical Corporation
P.O. Box 699
Pottstown, PA 19464

Attention: Mr. J.A. King, Manager
Environmental Compliance

Gentlemen:

In accordance with applicable provisions of the Pennsylvania Air Pollution Control Act as they apply to Occidental Chemical Corporation ("Occidental") located in Pottstown, Pennsylvania, the following agreement has been concluded.

1. On and after December 1, 1980, Occidental operated a coal fired combustion unit, numbered 4 ("#4 boiler") located at their Lower Pottsgrove Township, Montgomery County, Pennsylvania plant ("Pottstown plant"). The #4 boiler's particulate emissions are controlled by a fabric collector and a venturi collector operated in parallel. Sulfur dioxide emissions are regulated by restricting the sulfur content of the coal fired to the boiler.

2. Occidental also operates an oil-fired boiler ("#3 boiler") at their Pottstown plant.

3. On the dates below, malfunctions of the #4 boiler's venturi collector caused the emission of fly ash particulates which was in excess of that allowed by Section 123.11 of Chapter 123 of Title 25, Pa. Code, DER's Rules and Regulations. These alleged violations of DER's Rules and Regulations constitute alleged violations of Section 4008 of the Air Pollution Control Act, 35 P.S. §4008 ("Act"):

December 13, 1980	December 29, 1980	January 15, 1981
December 16, 1980	December 30, 1980	January 17, 1981
December 18, 1980	December 31, 1980	January 22, 1981
December 19, 1980	January 7, 1981	January 27, 1981
December 20, 1980	January 9, 1981	January 29, 1981
December 21, 1980	January 10, 1981	January 30, 1981
December 22, 1980	January 11, 1981	February 1, 1981
December 23, 1980	January 12, 1981	February 2, 1981
December 24, 1980	January 13, 1981	February 3, 1981
December 28, 1980	January 14, 1981	February 4, 1981

4. On the dates below, Occidental burned a coal in their #4 boiler with a sulfur content high enough to cause sulfur dioxide emissions in excess of that allowed by Section 123.22 of the DER's Rules and Regulations, 25 Pa. Code, Section 123.22. These alleged violations of the Rules and Regulations also constitute alleged violations of Section 4008 of the Act:

December 16, 1980	January 2, 1981	January 16, 1981
December 17, 1980	January 5, 1981	

5. On February 18, 1981 a malfunction of Occidental's #3 boiler caused the emission of visible particulates in excess of that allowed by Sections 123.11 and 123.41 of the DER's Rules and Regulations, 25 Pa. Code, Sections 123.11 and 123.41. This alleged violation of the Rules and Regulations also constitute alleged violations of Section 4008 of the Act.

6. Representatives of the Department and Occidental met on January 13, 1982 and agreed to voluntarily settle any claims for the alleged violations specified in Paragraph(s) 3, 4, and 5 hereof on the basis of a penalty payment of $1,000.00 to the Clean Air Fund of Pennsylvania.

7. Occidental shall make payment of the total amount due ($1,000.00) within 10 days after execution of this agreement. All checks shall be made payable to "Clean Air Fund of Pennsylvania" and be forwarded to:

Mr. Morris Malin, Chief
Division of Abatement and Compliance
Bureau of Air Quality Control
18th Floor, Fulton Building
200 North Third Street
Harrisburg, PA 17120

Payment shall be accompanied by form number ER-AQ-3, a copy of which is enclosed.

8. So long as Occidental executes this Letter-Agreement and makes the required $1,000.00 payment within the specified time period, the Department shall not institute any action at law or in equity for the alleged violations specified in Paragraph(s) 3, 4, and 5 above. If Occidental fails to comply with the provisions of this Letter-Agreement, the Department reserves all rights to institute appropriate action for said alleged violations.

I believe this Letter-Agreement accurately reflects the terms agreed upon at our recent meeting. Therefore, please have an authorized representative of the company execute and return two (2) signed copies of the agreement to me within ten (10) days of receipt. I will return a copy to Occidental after signing the agreement for the Department.

FOR: COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

8/23/82
DATE

N. Rao Kona
N. RAO KONA
REGIONAL AIR POLLUTION CONTROL ENGINEER

8/31/82
DATE

John R Embuck
ATTORNEY FOR THE COMMONWEALTH

Occidental Chemical Corporation, intending to be legally bound, hereby agrees to the terms and conditions of this Letter-Agreement.

FOR: OCCIDENTAL CHEMICAL CORPORATION

8/13/82
DATE

S. P. Dominick, Jr.
NAME

VICE PRESIDENT & GENERAL MANAGER, PVC RE
TITLE

A202

ER-AQ-3: Rev. 10/79

SEPTEMBER 2, 19 82

TRANSMITTAL OF PENALTY PAYMENT

PAYABLE TO: COMMONWEALTH OF PENNSYLVANIA

MAILING ADDRESS: Pa Department of Environmental Resources
Bureau of Air Quality Control
P.O. Box 2063 – 18th Floor Fulton Building
Harrisburg, PA 17120

FROM: Occidental Chemical Corp.
(Company)
Box 699
Pottstown, Pa. 19464

RE: Settlement Agreement with –

Company	Occidental Chemical Corp.
Plant	Pottstown, Pa.
Township	Lower Pottsgrove
County	Montgomery
Date	9/ 2/82 (Agreement Entered Into)

As required by the above agreement, a payment in the amount of $ 1000.00 is enclosed.

(FOR BOILER EMISSIONS EXCURSIONS)

J A King
(Signature) J. A. KING

MANAGER ENVIRONMENTAL COMPLIANCE
(Title)

ENCL.

cc: R. Kona, DER Norristown
J. Embick, DER Phila.
J. A. Mack
K. H. Garner
EAS

AR100060

Department of Environmental Resources

1875 New Hope Street
Norristown, PA 19401
215 631-2415

July 30, 1982

Occidental Chemical Corporation
P.O. Box 699
Pottstown, PA 19464

Attention: Mr. J.A. King, Manager
Environmental Compliance

Gentlemen:

In accordance with applicable provisions of the Pennsylvania Air Pollution Control Act as they apply to Occidental Chemical Corporation ("Occidental") located in Lower Pottsgrove Township, Montgomery County, Pennsylvania ("Pottstown plant"), the following agreement has been concluded.

1. On and after December 1, 1980, Occidental operated a polyvinyl chloride plant ("PVC plant") at their Pottstown plant. The PVC plant reacts vinyl chloride monomer ("VC") to produce dispersion or suspension resin which is subsequently dried.
2. On April 9, 1979 the Environmental Quality Board adopted and incorporated the National Emission Standards for Hazardous Air Pollutants ("NESHAP"), 40 CFR Part 61, under the DER's rules and regulations, 25 Pa. Code Chapter 124.

3. The NESHAP regulations require polyvinyl chloride manufacturing plants to limit their VC emissions. For those plants using stripping technology, the regulation limits the residual VC in dispersion and suspension resins.

4. Between December 1, 1980 and August 31, 1981, Occidental permitted excursions of residual VC above the NESHAP stripping limits. There were 22 alleged violations of 40 CFR Part 61.64(e)(1), and, consequently, of the Department of Environmental Resources' Rules and Regulations, 25 Pa. Code Chapter 124. These alleged violations also constitute alleged violations of Section 4008 of the Air Pollution Control Act, 35 P.S. §4008("Act").

5. Representatives of the Department and Occidental met on January 13, 1982 and agreed to voluntarily settle any claims for the alleged violations specified in Paragraph 4 hereof on the basis of a penalty payment of $1,500.00 to the Clean Air Fund of Pennsylvania.

6. Occidental shall make payment of the total amount due ($1,500.00) within 10 days after execution of this agreement. All checks shall be made payable to "Clean Air Fund of Pennsylvania" and be forwarded to:

Mr. Morris Malin, Chief
Division of Abatement and Compliance
Bureau of Air Quality Control
18th Floor, Fulton Building
200 North Third Street
Harrisburg, PA 17120

Payment shall be accompanied by form number ER-AQ-3, a copy of which is enclosed.

7. So long as Occidental executes this Letter-Agreement and makes the required $1500.00 payment within the specified time period, the Department shall not institute any action at law or in equity for the alleged violations specified in Paragraph 4 above. If Occidental fails to comply with the provisions of this Letter-Agreement, the Department reserves all rights to institute appropriate action for said alleged violations.

I believe this Letter-Agreement accurately reflects the terms agreed upon at our recent meeting. Therefore, please have an authorized representative of the company execute and return two (2) signed copies of the agreement to me within ten (10) days of receipt. I will return a copy to Occidental after signing the agreement for the Department.

FOR: COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

5/24/82
DATE

N. Rao Kona
N. RAO KONA
REGIONAL AIR POLLUTION CONTROL ENGINEER

8/31/82
DATE

John R Embick
ATTORNEY FOR THE COMMONWEALTH

Occidental Chemical Corporation, intending to be legally bound, hereby agrees to the terms and conditions of this Letter-Agreement.

FOR: OCCIDENTAL CHEMICAL CORPORATION

8/13/82
DATE

J. Dominick
NAME

1CD208

ER—AQ—3: Rev. 10/79

SEPTEMBER 2, 1982

TRANSMITTAL OF PENALTY PAYMENT

PAYABLE TO: COMMONWEALTH OF PENNSYLVANIA

MAILING ADDRESS: Pa Department of Environmental Resources
Bureau of Air Quality Control
P.O. Box 2063 – 18th Floor Fulton Building
Harrisburg, PA 17120

FROM: Occidental Chemical Corp.
(Company)
Box 699

Pottstown, Pa. 19464

RE: Settlement Agreement with –

Company: Occidental Chemical Corp.

Plant: Pottstown, Pa.

Township: Lower Pottsgrove

County: Montgomery

Date: 9/2 /82
(Agreement Entered Into)

As required by the above agreement, a payment in the amount of $ 1500.00 is enclosed.

(FOR VCM EMISSIONS EXCURSIONS)

J.A. King
(Signature) J. A. KING

MANAGER ENVIRONMENTAL COMPLIANCE
(Title)

ENCL.

cc: R. Kona, DER Norristown
J. Embick, DER Phila.
J. A. Mack
K. H. Garner
EAS

AR100063

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
1875 New Hope Street
Norristown, PA 19401
215 631-2405

RECEIVED
MAY 13 1980
J. A. King

The Firestone Tire & Rubber Company
P.O. Box 699
Pottstown, PA 19464

Attention: Mr. Joseph A. King
Coordinator, Special Projects

CONSENT ORDER AND AGREEMENT NO. 80-427-C

WHEREAS, the Firestone Tire and Rubber Company ("Firestone") is a corporation qualified to do business in the Commonwealth of Pennsylvania and is so doing business in the Commonealth at Lower Pottsgrove Township, Montgomery County ("Pottstown Plant"); and,

WHEREAS, Firestone's operations at its Pottstown Plant includes the use of an oil-fired combustion unit ("No. 1 Boiler") and eleven Banbury mixers; and,

WHEREAS, Firestone's operation of the Banbury mixers produces a viscous sludge comprised of oil, carbon black and rubber ("Banbury sludge"); and,

WHEREAS, Firestone has indicated to the Department that the composition of the Banbury sludge prevents its reuse in the process and prevents its disposal by landfill techniques; and,

WHEREAS, Firestone has been incinerating sludge from the Banbury mixers in its No. 1 boiler since December 1978; and,

WHEREAS, the Department of Environmental Resources ("Department") has determined that emissions from No. 1 boiler stack during incineration of Banbury sludge are in excess of the limits allowed under Section 123.41 of Chapter 123 of the Rules and Regulations of the Department, thereby placing Firestone in violation of Section 8 of the Pennsylvania Air Pollution Control Act ("Act"); and,

WHEREAS, Firestone has indicated its intention to permanently discontinue the operation of its eleven Banbury mixers.

WHEREAS, Firestone has indicated its willingness to comply with said Act and all Air Resources Regulations promulgated thereunder; and,

(#1 Boiler, Banbury Tailings)

NOW THEREFORE, on this 22 day of May 1980, after full and complete negotiations of all matters set forth in this Consent Order, and upon mutual exchange of covenants herein, and intending to be legally bound hereby, it is ordered by the Department and agreed to by Firestone that:

1. On or before December 1, 1980 emissions from the No. 1 boiler stack shall conform to the requirements of the Act and Chapter 123 of the Rules and Regulations of the Department and shall thereafter continue to comply with said Act and Regulations.

2. In order to comply with Paragraph 1 above, Firestone shall on or before December 1, 1980 terminate the Banbury sludge incineration in No. 1 boiler.

3. During implementation of the corrective action required under this Consent Order and Agreement, Firestone shall take all reasonable interim measures suggested by the Department as necessary to keep the above described emissions to a minimum, including, where appropriate, full utilization of existing emission control devices and operating procedures.

4. Nothing herein shall be construed to preclude Firestone from discontinuing the incineration of Banbury sludge in No. 1 boiler. Any such discontinuance shall, for the duration thereof, have the same effect as compliance with the Department's Regulations. However, if Firestone does discontinue incineration of Banbury sludge in No. 1 boiler, it shall promptly so notify the Department in writing. Firestone shall not resume operation of said source after December 1, 1980 unless and until approved air pollution control equipment has been installed and made operational and the source is capable of meeting the air contamination emission standards promulgated in the Rules and Regulations of the Department. Notwithstanding any provisions of this Consent Order and Agreement, if a source is out of operation for one year or more, it shall be subject to §127.11 of the Department's Regulations.

5. This Consent Order and Agreement constitutes an Order of the Department issued pursuant to Section 4 of the Act. Firestone recognizing its right to appeal any Order of the Department hereby waives its right to appeal this Order.

6. Contemporaneously with the execution of this Consent Order and Agreement, Firestone shall make a payment to the Clean Air Fund in the amount of One Thousand Six Hundred Dollars ($1600.00) in settlement of violations of Section 123.41 of the Rules and Regulations of the Department between January 1, 1979 and April 30, 1980.

7. Between May 1, 1980 and December 1, 1980 Firestone shall make a payment of One Hundred Dollars ($100.00) per month for each month of non-compliance operation of No. 1 boiler, provided that in no event shall compliance be delayed beyond December 1, 1980.

8. All payments shall be made payable by check to the Commonwealth of Pennsylvania and sent to the attention of:

Michael F. Robinson, Chief, Staff Services
Division of Administrative Services
Bureau of Air Quality Control
Eighteenth Floor, Fulton Building
200 North 3rd Street
Harrisburg, Pennsylvania 17120

Checks shall be accompanied by Form No. ER-AQ-3.

9. So long as Firestone fully complies with all the provisions and requirements set forth in this Consent Order and Agreement within the times specified for such performance, the Department shall not institute an action at law or in equity for the violations of the laws of the Commonwealth specified in the WHEREAS clauses hereof; but if Firestone fails to fully comply with all the provisions and requirements hereof in a timely manner, the Department may institute any appropriate action based upon any violation whether or not said violation predates the failure of Firestone to fully comply with this Consent Order and Agreement.

10. The Department reserves all rights to enforce this Consent Order and Agreement and to prosecute any violations of any Acts or Rules and Regulations of the Department except those explicitly waived in this Consent Order and Agreement. All rights and remedies contained herein are to be concurrent, unless specifically provided to the contrary.

11. Furthermore, this Consent Order and Agreement shall not be considered as a limitation or abridgment of the Department's rights and duties pursuant to Section 6.2 of the Act, 35 P.S. §4006.2; and nothing herein shall be construed to imply that the Department waives its right to bring such further enforcement action subsequent to any testing as may be necessary to achieve compliance with all applicable regulations and ambient air quality standards.

12. In the event of any material breach of this Consent Order and Agreement on the part of Firestone, the Department may, at its option, in addition to the remedies prescribed herein, proceed with any action at law or in equity to bring about compliance with the Act and the Rules and Regulations of the Department.

13. This Consent Order and Agreement shall bind the parties, their agents, servants, employees, and assigns.

14. This is the entire agreement between the parties and no alterations, additions or amendments thereto shall be valid unless in writing and executed by the parties.

15. This Consent Order and Agreement does not grant a variance from any requirement of the Air Pollution Control Act (35 P.S. §4001, et seq), the Clean Air Act (42 U.S.C. §7401 et seq) or any regulations promulgated thereunder, nor does it purport to modify any requirement of Pennsylvania's State Implementation Plan as approved under §110 of the Clean Air Act. Further, this Consent Order and Agreement does not constitute a Consent Order under the provisions of §113(d) of the Clean Air Act. Notice is hereby provided to Firestone that it may be subject to additional penalties for non-compliance with the Pennsylvania State Implementation Plan under §120 of the Clean Air Act.

THE FIRESTONE TIRE & RUBBER COMPANY

May 22, 1980
DATE

BY: H E Powell
PLANT MANAGER

May 22, 1980
DATE

ATTEST: Joseph A. King

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

5/27/80
DATE

BY: N. Rao Kona
N. Rao Kona
Regional Air Pollution Control Engineer

5/29/80
DATE

Louise S. Thompson
Louise S. Thompson
Assistant Attorney General

3S25

AR100067

(#1 Boiler, Banbury Tailings)

COMMONWEALTH OF PENNSYLVANIA :
COUNTY OF MONTGOMERY : SS.

I, Harold E. Powell being duly sworn according to law, do hereby swear or affirm that I am the Plant Manager of The Firestone Tire and Rubber Company and that I am authorized to execute this Consent Order and Agreement on behalf of the Company.

SWORN TO AND SUBSCRIBED :

BEFORE ME THIS 22nd DAY :

OF May 1980 :

Elizabeth Q. [illegible]
NOTARY PUBLIC

3S25 [illegible], Notary Public
[illegible], Montgomery Co., Pa.
My Commission Expires April 17, 1982

June 26, 1980: Original to Mr. J. J. McCoskey
pc: Mr. R. M. Walter, Akron
Mr. J. A. King, Pottstown

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
1875 New Hope Street
Norristown, PA 19401
215 631-2415

May 8, 1980

RECEIVED
MAY 12 1980
J. A. King

Mr. Joseph A. King
Coordinator, Special Projects
Firestone Tire and Rubber Company
P.O. Box 699
Pottstown, PA 19464

Dear Mr. King:

This letter agreement is made between the Commonwealth of Pennsylvania Department of Environmental Resources ("Department") and the Firestone Tire and Rubber Company ("Firestone"), an Ohio corporation qualified to do business in the state of Pennsylvania and which is doing business at its plant in Lower Pottsgrove Township, Montgomery County, Pennsylvania ("Pottstown plant").

Firestone operates a boiler plant including a 120 million BTU per hour combustion unit capable of firing either coal or oil ("No. 4 Boiler"). During periods of coal combustion, particulate emissions from No. 4 Boiler are controlled by a fabric collector.

Due to a malfunction in the fabric collector fan, Firestone found it necessary to bypass the fabric collector from March 26, 1980 to April 2, 1980 while coal was being fired in the No. 4 Boiler.

On the above dates, emissions from No. 4 Boiler exceeded the limits allowed under Sections 123.11 and 123.41, Chapter 123 of the Rules and Regulations of the Department.

The Department has agreed to forego litigation or other enforcement of Section 123.11 and 123.41 of the Rules and Regulations of the Department, 25 PA Code, Chapter 123 for the above dates in consideration of Firestone's improvements in the operation of the fabric collector and in consideration of payment by Firestone to the Clean Air Fund of Pennsylvania as more fully stated below.

Agreement on the part of Firestone to make the payment to the Clean Air Fund of Pennsylvania and agreement on the part of the Department to forego enforcement of its Rules and Regulations were made in an effort to settle the dispute between the parties in an amicable manner without trial or adjudication of any issue of fact or the law, and the parties expressly agree that this agreement shall not constitute an admission on either part with respect to any issue of fact or law.

(Baghouse, #4 Boiler)

IT IS AGREED, THEREFORE, AS FOLLOWS:

1. Firestone shall on and after April 17, 1980 make the No. 4 Boiler at its Pottstown plant conform to the requirements of the Pennsylvania Air Pollution Control Act and Sections 123.11 and 123.41 of Chapter 123 of the Rules and Regulations of the Department and shall thereafter continue to operate said Boiler in compliance with said Act and Regulations and all other Air Resources Regulations of the Department.

2. Firestone shall pay to the Clean Air Fund of Pennsylvania the sum of seven hundred dollars ($700.00) representing one hundred dollars ($100.00) per day for each of the above dates on which the fabric collector was out of service. Said payment shall be made contemporaneously with the execution of this Agreement. This sum is in settlement of claims for violation of the Air Pollution Control Act and Sections 123.11 and 123.41, Title 25 of the Pennsylvania Code. The payment shall be made by check payable to the Clean Air Fund of Pennsylvania and forwarded to Mr. Michael F. Robinson, Director of Administrative Services, Bureau of Air Quality Control, 18th Floor, Fulton Bank Building, 200 N. Third Street, Harrisburg, PA 17120. Payment shall be accompanied by a completed copy of Form ER-AQ-3, a copy of which is enclosed.

3. In consideration of the foregoing, the Department agrees that it will not initiate any action at law or in equity against Firestone, its officers or employees for violations on the above dates of Sections 123.11 and 123.41 of the Rules and Regulations of the Department caused by operation of this No. 4 Boiler without control by the fabric collector.

Please have an authorized representative of Firestone sign and return two copies of this Agreement to me within ten days of its receipt.

FOR: COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

5/7/80
DATE

N. Rao Kona
BY: N. Rao Kona
Regional Air Pollution Control Engineer

(Baghouse, #4 Boiler)

GROUND WATER MODULE
PHASE I

Geology

I. Glacial and Alluvial Materials

A. Is the site within the glaciated area of Pennsylvania? Y (N)

B. Are glacial or alluvial deposits present under the proposed site? (Y) N

1. What is their maximum thickness? 12 feet

2. What is their minimum thickness? 0 feet

3. How were the thicknesses determined? Range in thickness taken from Montgomery County Soil Map Data.

4. Are the location(s) of maximum and minimum thicknesses shown on the large scale map? Y (N)

5. Discuss the effects of these materials on discharges from the proposed facility.

Most alluvium resulted from stream deposited silt and other fines creating several layers of impervious material which impede drainage.

II. Bedrock

A. Formation name Brunswick

B. Lithologies (plot on large scale map if more than one lithology)

Reddish brown shale, mud stone and siltstone with sandstone and fanglomerate in this area.

C. Are all areas where depth to bedrock is less than 5 feet shown on the large scale map? Y (N)

D. Does bedrock crop out within the boundaries or within 200 feet of the proposed facility? Y (N)

1. Are all outcrops shown on the large scale map? Y N (N/A)

E. Characterize the degree of weathering Moderate weathering, zone of greatest weathering lies above 200 feet. The voids and joints are partly plugged with weathered clays. This results in lower yields to wells above the 200 foot level.

c. Strike _____ and dip _____ of cleavage.

7. Faults No known faults in vicinity.

a. Strike _____ and dip _____ of faults.

b. Strike _____ and dip _____ of faults.

c. Strike _____ and dip _____ of faults.

8. Are the locations of all faults that occur within 1/4 mile of the site's boundaries shown on the large scale map and 7 1/2 minute topographic map? Y N (N/A)

9. Are all lineaments and fracture traces located on both the 7.5 minute topographic map and the large scale map? Y N (N/A)

10. Briefly characterize these fractures, joints, etc. and discuss their control on the movement of infiltrating water and ground water. Ground water flow is through secondary openings and nearby joints which intersect at various angles. The number and width of these joints are variable. These openings also allow downward movement of precipitation to recharge aquifer.

H. Has a saprolite developed on the bedrock? Y (N)

1. What is the shallowest depth from the surface to bedrock. _____ feet.

2. Describe the texture _____

I. Is bedrock a carbonate rock? Y (N)

1. Are there any undrained surface depressions or sinkholes at the site? Y (N)

2. Show all sinkholes within 1/4 mile of the site on the 7 1/2 minute topographic map and on the large scale map? Y (N)

J. Are there any active or inactive deep mines within 1/4 mile of the site boundaries? Y

1. What is the minimum depth to mined-out area? _____ feet

2. What is the areal extent of the mined-out area _____

3. What mineral resource was extracted? _____

a. If coal, name the seam(s) that were mined. _____

_____

_____

Name and address of geologist supplying the above data:

Name: Dennis Pennington

Street: Sanders & Thomas, Inc., Griffith Towers Building

City & State Pottstown, Pa. Zip 19464

Phone Number (include area code): 215-326-4600, Ext. 244

Sources of Data and Comments:

1. Newport, Thomas G., 1973, Ground-Water Resources of Montgomery County, Pa. Water Resource Report 29. Pennsylvania Topographic and Geologic Survey.

2. Longwill, S.M. and Wood, C.R., 1965, Ground-Water Resources of the Brunswick Formation in Montgomery and Berks Counties, Pennsylvania, Pennsylvania Topographic and Geologic Survey Bull. W-22.

GROUND WATER MODULE
PHASE I

Hydrology

I. Have test pits __X__, borings ____, or wells ____ (check one or more) been made for the hydrologic investigation? (Y) N

A. Is the required complete geologic description (log) of all earth materials penetrated included? (Y) N

B. If a well, what was the method of drilling? _____.

II. Depth to ground water table

A. The maximum depth to the water table within the site is __9__ feet.

1. Date of measurement __May, 1974__.

2. The location is shown on the 7.5 minute ____ or large scale __X__ map (check one). Test Pit 3

3. If measurement is from a well or pit, give date of completion for same __May, 1974__.

B. The minimum depth to the water table within the site is __1__ feet.

1. Date of measurement __May, 1974__.

2. Is the location shown on the 7.5 minute ____ or large scale __X__ map (check one). Test Pit 4

3. If measurement is from a well or pit, give date of completion for same __May, 1974__.

C. Describe seasonal water table fluctuations at the above locations.

Since seasonal variation of precipitation is small, the dominant factor controlling the fluctuation of the water table is evapotranspiration. The water table declines throughout April-October and rises the remainder of the year.

D. Describe all perched or special water table conditions.

Wells located northwest of landfill site are pumped continously. If yields of these wells are high enough, the result may be a reversal of the hydraulic gradient and thus a reversal in the ground-water flow direction will occur.

E. Does ground water drain to deep mines? Y (N)

III. Have you shown the direction(s) of ground water movement from the site on the ____large scale or __X__7.5 minute map (check one)? (Y) N

A. Describe how the above was determined:

From general ground-water information. Natural ground-water flow is toward the Schuylkill River.

B. The location of the ground water discharge point(s) affected by this facility is Schuylkill River and various seepages when water table is high.

C. Discuss the rate of ground water flow at this site as it applies to the operation of this facility: Ground-water flow under natural conditions is impeded by many scattered impervious layers of soil. Water table is relatively flat so ground-water movement is slow.

IV. Describe below the proposed ground water quality monitoring points for approval. (For sanitary landfills, monitoring point proposals are subject to final approval of the Engineering Design Plans. No wells are to be drilled until final approval of the Engineering Design Plans.)

A. Wells (check one)

1. ___ For existing wells complete the table below.

2. X For proposed new well construction, complete the table from your specificiations.

Monitoring Point Number	Drilling Method	Depth	Diameter	Casing Depth	Zones Perforated	Location*		Surface Elevation
						Inches North	Inches West	
4	Pneumatic or Auger		4" I.D.			18.38	15.66	
5	Pneumatic or Auger		4" I.D.			18.52	15.47	
6	Pneumatic or Auger		4" I.D.			18.61	15.32	

*Measured from the southeast corner of the 7.5 minute topographic map.

B. Springs

Monitoring Point Number	Elevation	Rate of Flow (gpm)	Date of Measurement	Location*	
				Inches North	Inches West

*Measured from the southeast corner of the 7.5 minute topographic map.

1. Do all springs listed have a continuous year-round flow? Y N (

   a. If not, explain _____

   _____

C. Other - describe and locate.

_____

_____

_____

_____

FOR DEPARTMENT USE ONLY:
(For sanitary landfills this constitutes preliminary approval only. No wells are to be drilled until final approval of the Engineering Design Plans.)

Proposed monitoring point locations and construction approved:

Name: _____ Date _____

Comments: _____

V. Name and address of geologist or hydrogeologist supplying the above data:

Name: Dennis Pennington

Street: Sanders & Thomas, Inc., Griffith Towers Bldg.

City & State: Pottstown, Pennsylvania Zip 19464

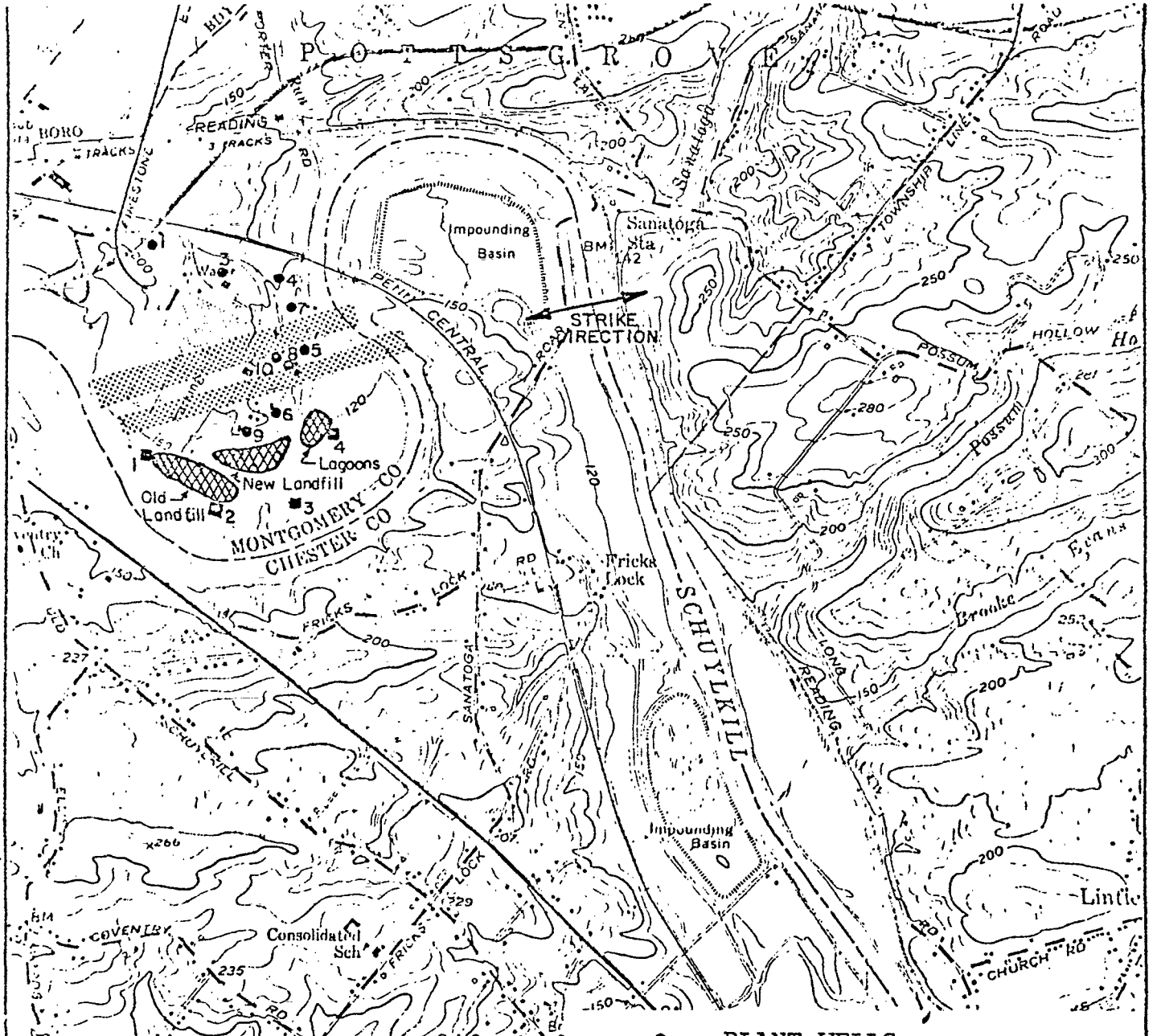
Phone Number (include area code) 215-326-4600, Ext. 244

Sources of Data and Comments:

1. Newport, Thomas G. 1973 Ground-Water Resources of Montgomery County, Pennsylvania. Water Resource Report 29. Pennsylvania Topographic and Geologic Survey.

2. David, S.N. and DeWiest, R.J.M., Hydrogeology, 1966, John Wiley & Sons, N.Y.

3. Pennington, D., 1974. Physical and Chemical Processes Controlling the Migration of Pollutants Resulting from Land Disposal of Liquid and Solid Wastes into Subsurface Waters. Seventh Mid-Atlantic Industrial Waste Conference, Phila., Pa. (In press)



AVAN martin and martin, incorporated

OUTCROP PATTERN OF THE LOCKATONG FORMATION INFLUENCING WHICH CONTROL GROUND WATER FLOW A HIGH PERMEABILITY BETWEEN PLANT WELLS

TEST PIT DESCRIPTIONS

Firestone Tire & Rubber Company
Pottstown, Pa. 19464

Test Pit 1 - Fill Material

		0'0"
A	18" Decomposed fragments of wood and ash, reddish brown color.	1'6"
	2" Gray ash resin layer	1'8"
B	30" Light brown clay rich, relatively few fragments of fill material.	4'2"
C_1	72" Dark red-black material, fine sandy clay rich loam.	10'2"
C_2	46" Large amounts of rock fragments and occasional pieces of concrete, silty loam.	14'0"

Test Pit 2 - Fine Silty Loam

		0'0"
A_1	2" Decomposed organic mat.	0'2"
A_2	18" Dark gray coal rich layer.	1'8"
B	42" Gray silt-clay layer with some fine coal particles.	5'2"
C	70" Light brown layer - clay rich, lightly mottled in bottom section, silty loam.	11'0"

Test Pit 3 - Silty Loam

		0'0"
A_2	20" Light tan loose layer containing small sized fill material.	1'8"
B	6" Red-brown layer-clay rich	2'2"
C	94" Silt-dark gray to black, rock fragments present in bottom portion, silty loam. Between 9' and 10' water table reached.	10'0"

Test Pit 4 - Fill Material

		0'0"
B	108" - Fill material, large fragments of boards, logs, and concrete block. Water table reached at 1'.	9'

Note: Horizons are for classifications purposes only since most soils have been disturbed by man and do not have definite soil morphology.

Occidental Chemical Corporation

July 15, 1983

Mr. J. Feola
Pa. DER
1875 New Hope St.
Norristown, PA 19401

CONFIDENTIAL

Dear Mr. Feola:

Confirming our telephone conversation of July 14, 1983, we would like to meet with you on July 28, 1983 - 1:30 p.m. at your office to discuss our plans for an investigative/remedial program at our Pottstown plant.

We have been aware of the presence of trace levels of trichloroethylene (TCE) in our production wells for some time, and since our process does use TCE, we have had an ongoing effort to determine whether our operation could itself be the source. By far, the greatest amount found in any well is in production well #8 which averages 2.0 ppm. In a recent study our consultant, SMC Martin, Inc., concluded that the TCE was coming from past spillage along the railroad tracks and spillage into our tank farm dike. The maximum amounts of TCE found were 1300 ppm in the soil by the tracks and 150 ppm in soil in the tank farm dike. They recommended a limited excavation program along the railroad tracks and a shallow groundwater monitoring program in the area near the tracks and the tank farm.

We have contracted with Betz-Converse-Murdoch, Inc. to perform that additional work and will be prepared to discuss that program with you at our July 28 meeting.

The TCE does not constitute a threat to health or the environment. The cone of depression created by our production wells prevents groundwater and thus the TCE from leaving the site, and the wells used for drinking water are tested monthly. The amount of TCE in the production wellwater is not significant to the process, since additional TCE is added to the process mixture. Effluent from the process contains approximately 1.0 ppm TCE and is treated in the on-site pretreatment plant before being discharged to the Pottstown POTW.

As background, a brief history of the Pottstown site will probably be helpful to you. Since the 1940's three manufacturing plants operated here under ownership of the Firestone Tire & Rubber Company: tire production, PVC Resin production and PVC Resin processing into sheeting goods. In July, 1980 the tire operation was shut down permanently. In December, 1980 the site was purchased by the Hooker Chemical Company and was operated as the Hooker Chemicals and Plastics Corporation. In April, 1982 a name change only took place to the Occidental Chemical Corporation. Through all of this the PVC production and PVC processing plants continued to operate as before.

bcc: S. P. Dominick, Jr.
C. W. Engblom
K. H. Garner
R. F. Gervais, Jr.
F. F. Hoy
C. J. Kleinert
J. A. Mack
R. J. Schaffer
Niagara Falls

We look forward to our meeting for a thorough discussion of this issue.

Very truly yours,

JA King

Joseph A. King
Manager, Environmental Compliance

JAK:kh

Occidental Chemical Corporation

May 4, 1984

PA DER
1875 New Hope St.
Norristown, PA 19401

Attention: Mr. L. Lunsk

Dear Larry:

This is to follow up my recent telephone notice to you about our planned TCE-contaminated soil cleanup during our 1984 summer maintenance plant shutdown.

After a site visit on May 3 by members of the Norristown Water Quality Section, W. Stanley, R. Day-Lewis, and J. LaRegina, DER approval was given to excavate certain "TCE hot spots" for off-site disposal and back fill these with clean earth. On excavation, the contaminated soil becomes a Hazardous Waste.

We will now award a contract for this project whose salient points are:

1. Schedule: June 23 - July 6. Completion must occur within this period; it is only then that surrounding pipelines, etc., are clear of potentially explosive materials.

2. Amount of Hazardous Waste: About 300 cu. yds. of earth having TCE contamination in boring samples of 0.7, 0.5, 19.7, 4.6, 0.5 MG/KG.

3. Final Disposal: Either CECOS, Niagara Falls, or Evergreen Landfill, Northwood, Ohio.

4. Temporary Storage on Site: So that the number of trucks is kept to a reasonable limit, excavated earth will be placed on a 10 mil thick plastic ground cover, and the mounds covered each night, and in the event of rain, with the same material. Loading of trucks will be done from these mounds. The entire off-site hauling will be completed by July 15.

5. Hazardous Waste Quarterly Report: This off-site disposal will be reported as required under PA Hazardous Waste Regulations

J. A. King

JAK:pll

OXY

AR100081

Hooker Chemical
PLASTICS DIVISION
Firestone Blvd
P.O. Box 699
Pottstown, PA 19464
215 / 326-2000

Bl-cc: C. J. Kleinert
K. H. Garner
G. C. Grow
A. E. Schmeck
E. Lapreziosa
R. Zelley
H. Dubec

January 25, 1982

pcs 1/26/82 TO: R J Schuttler
A Macla
EAIS N.F.
EAIS L-A.

Mr. J. LaRegina
Pa. DER
1875 New Hope St.
Norristown, Pa. 19401

Dear Mr. LaRegina:

RE: NPDES Permit PA 0010944 and your letter of 12/31/81.

The DER lab test result of 31 mg/l oil and grease for the sample you obtained from our Outfall #001 during your 11/9/81 inspection is of a surprising magnitude in view of the record shown on Attachment (A) to this letter.

On Attachment (A) a tabulation of our reports to DER, even during the phasing out of tire manufacture and, later, removal of tire making equipment, periods of much confusion, upset conditions and poor worker morale, the highest oil and grease excursion was 17 mg/l excluding a single episode of 116 mg/l generated by the probable negligence of an outside contractor in removing equipment.

Because of this we can only question the sample and this refers to sampling location. Our sample location for compliance testing of Outfall #001 is in the flow stream entering the pit from which you obtained your sample. You took your sample more or less in the middle of the pit where the floating oil sheen material may have been caught in your container. Therefore, we request a repeat evaluation when it is convenient for your return. We propose to split a common sample for the additional purpose of comparison of any possible differences between testing labs.

On the telephone 1/21/82, you explained that an oil and grease test was not run on the inlet river water sample you obtained 11/9/81. You stated that this was because DER has no allowance for background levels for pollutants whose discharge limits are specified as concentrations. This appears to be at variance with instructions in DER's application forms for Permit renewal where background analyses are permitted (our Permit renewal is currently in preparation for 3/15/82 submittal). Since the end of the tire plant liquidation we have been somewhat mystified by even minor excursions above the oil and grease limit such as those of 9/81 and 10/81. We request DER's reconsideration of the effect of background levels in our case and submit Attachment (B) for illustration.

In answer to the questions at the end of your 12/31/81 letter:

Actions we have taken to comply:

A complete physical inspection (by Hooker) was conducted and indicated some cleanup and maintenance might give added insurance against excursions. Refresher training of personnel, whose activities might have impact on the NPDES discharge system, was given on leak and spill prevention and control.

Date compliance was obtained:

Nov. 11, 1981; see Attachment (B)

Steps taken to prevent recurrence:

When the winter freeze moderates a clean-up and maintenance tune-up program will begin in those areas indicated from the inspection referred to above.

Refresher training on leak and spill prevention and control will be given on a more frequent periodic schedule than in the past.

Very truly yours,

HOOKER CHEMICALS & PLASTICS CORP.

J. A. King, Manager
Environmental Compliance

JAK/rm

Attachments

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
1875 New Hope Street
Norristown, Pennsylvania 19401
215 631-2409

December 31, 1981

RECEIVED
JAN 4 1982
J. A. KING

Hooker Chemical & Plastics Corp.
Armand Hammer Blvd.
Box 699
Pottstown, PA 19464

Attention: Mr. Joseph King

Re: PA 0010944
Hooker Chemical & Plastics Corp.
Lower Pottsgrove Township
Montgomery County

Dear Mr. King:

This is to confirm the results of my inspection conducted on November 9, 1981 which revealed an oil and grease concentration at outfall 001 of 31 mg/l. Oil and grease excursions were also noted in the September and October Discharge Monitoring Reports. Concentrations were reported at 12.8 mg/l and 10.4 mg/l respectively.

Such discharges are in violation of your permit No. Pa 0010944.

A copy of the sample results is enclosed for your information.

Notify this office in writing no later than January 22, 1982 of the action you have taken to comply, the date compliance was accomplished and the steps you have taken to prevent a recurrence of the violation.

If you have any questions, please feel free to contact me.

Very truly yours,

James LaRegina

JAMES LAREGINA
Water Quality Specialist

cc: EPA 3EN22
Re 30 A345

PCS TO DIR ENV. PROT., NIAG. FALLS 1/4/82
DIR H+E LOS ANGELES 1/4/82

T Sheehan DER

XXI POLLUTION INCIDENT HISTORY

A. BOILER HOUSE

1. In February, 1972, a whitish discharge to the river resulted from a blockage in the diverter of the boiler and softener discharge lines to the lagoons. Liquid overflowed to the storm sewer.

Action to prevent a recurrence - the boiler and softener discharges are pumped to the Chemical Plant effluent system discharging to the Borough of Pottstown Waste Treatment Plant. This change eliminated the normal usage of the lagoon and has since prevented a recurrence of such an incident.

2. On February 11, 1978, there was an estimated 1,000 gallon oil spill (#6 fuel oil) into the Schuylkill River. A high level control instrument malfunctioned and failed to stop the pump in transferring oil from an above-ground tank to an underground tank. Overflow from the underground storage tank entered the storm sewer and subsequently the in-plant oil collection system was overloaded with oil and the excess was discharged into the river.

The non-compliance period was estimated to have extended from the afternoon of February 11 to February 15, 1978. Clean up operations in the Schuylkill River were from February 11 until March 16, 1978. Fines were paid to the Pennsylvania Fish Commission Fish Fund, to Pennsylvania Dept. of Environmental Resources Clean Water Fund and to the United States Coast Guard.

Action to prevent recurrence ---

Refresher training of all personnel involved in handling and pumping fuel oil, with emphasis on spill prevention, was completed.

The circuit system to the 4 tank hi-level alarms was revised making it necessary for all 4 switches to malfunction in order for a tank to overflow.

Updated the in-company and outside surveillance, communication and notification procedures. Outside notification included -

EPA, Philadelphia
DER, Norristown
Coast Guard, Philadelphia
Home Water Co., Royersford
Phoenixville Water Co., Phoenixville
Fish Commission, Montgomery County

A once-per-day composite sampling and oil analysis of the discharge into the river was initiated and continued until the in-plant collection system was back in operation (2/22/78).

B. CHEMICAL PLANT

Accidental discharges over the years have occurred, for the most part, in areas where they were contained in the Chemical Plant's effluent system - the treated effluent is pumped to the Borough of Pottstown Waste Treatment Plant.

Accidental discharges, not contained above, and the action taken to prevent recurrences are listed below:

1. Loss of half of the contents of a storage tank containing recycle vinyl chloride monomer when a bottom valve malfunctioned. Initially the monomer escaped as a liquid inside the dike, but vaporized quickly to the atmosphere. This occurred in 1963.

   Action to prevent recurrence---

   The above type of incident caused by mechanical failure may be circumvented by injecting fire water into the monomer tank bottoms through installed fittings. In this way, time would be gained to deal with the problem.

2. Infrequent overflows of cooling water from a pump house sump during power failures in a period when emergency power was not available. Loss of power allowed gravity draining to the sump with subsequent discharge into the ground outside of the pump house.

   Action to prevent recurrence ---

   This has not occurred since the 1968 installation of a diesel operated emergency power generator. Periodically the appropriate personnel review the

Emergency Power Plan (orginally issued in April, 1969 and updated) regarding the use of the emergency power generator and the control of the equipment during power failures.

3. In 1961, a catalyst solution overflowed when the fire water deluge system over the storage tank malfunctioned overfilling the tank. Discharge was into the emergency retaining area.

Action to prevent a recurrence ---

The above type of malfunction has been neutralized by the replacement of the original deluge system with a standard fire water sprinkler system.

4. In 1960, there was a spillage of caustic solution from the open bottom valve of the storage tank during the unloading from a tank truck. Some of the material was not retained inside the dike and escaped onto the ground before the dike drain valve was closed.

Action to prevent a recurrence ---

Improved training and supervision of workers have been very effective in preventing this human error from recurring.

C. FABRICATED PRODUCTS

1. In February, 1980, during non-operating hours, a plant security guard discovered an epoxidized soybean oil tank overflowing behind #1 calender banbury mill. Within a short period of time, he closed a valve thereby stopping the flow. Although approximately 300 gallons were spilled, none of the material reached a floor drain. The clean-up was routinely handled by the janitorial department. No environmental problem occurred.

2. In July, 1981, during the unloading of epoxidized soybean oil from the carrier's truck into an underground tank, the fill line came out of the storage tank and spilled approximately 200 pounds of the oil. The spill occurred on a curbed unloading pad and was immediately discovered by an employee monitoring the unloading procedure. The cause of the spill was the failure to use the proper connecting fitting by the truck driver. The clean-up was routinely handled by the janitorial department. No environmental problem occurred.

XXI POLLUTION INCIDENT HISTORY (CONT'D.)

D. PILOT PLANT

In 1974, a spill resulted when a technician left the area in which he was filling an acrylonitrile charge tank allowing the material to discharge through the flame arrester onto the Pilot Plant roof. The spill was contained to the Pilot Plant roof and did not result in any environmental harm.

Action to prevent recurrence ---

Training is re-emphasized to monitor any unloading, loading or filling of a tank. If there is a need to leave the area, some other person should continue the monitoring or the unloading, etc. should be discontinued until such monitoring is available.

E. RESEARCH/DEVELOPMENT & TECHNICAL SERVICE

Does not apply.

F. STORE ROOM

Does not apply.

Firestone

INTEROFFICE

DATE March 30, 1978

TO Memo

FROM J. A. King

REFERENCE

SUBJECT SETTLEMENT WITH PENNA. FISH COMMISSION FOR OIL SPILL, FEBRUARY 11, 1978

Mr. G. Bowersox today received a $500.00 payment to the "Penna. Fish Commission Fish Fund" in settlement of this incident. Mrs. M. E. Burns, Receptionist, witnessed the payment in our main office lobby.

Later in Mr. H. S. Newman's office Mr. Bowersox verbally assured Mr. Newman and myself that the matter was closed and that there would be no further legal or other action against the Company for this discharge by the Penna. Fish Commission.

The original of the Field Receipt is in the possession of Mr. R. K. Johnson, our Controller. Mr. Newman signed for the Company.

J. A. King

JAK/rm

cc: Mr. H. S. Newman
Mr. T. C. Walker
Mr. R. K. Johnson
Mr. G. W. Wamsley
Mr. T. I. Veiock, Akron
Mr. J. R. Laman, Akron
Mr. R. M. Walter, Akron
Mr. S. W. String, Akron
Mr. J. D. Clark, Akron

Received copies of Field Receipt:

Mr. H. S. Newman
Mr. T. I. Veiock, Akron
Mr. J. R. Laman, Akron
Mr. R. M. Walter, Akron
Mr. J. A. King

AR100089

S1273A

Receipt № 30990

Pennsylvania Fish Commission—Field Receipt

Received this 31st day of March 1978 from Firestone Rubber, Tire & Rubber Co.
residing at Firestone Blvd, Pottstown (Full Address) State of PA.
the Sum of $500.00 being the penalty for violation of Section 200
of the Pennsylvania Fish Law, being the act of Dec. 15, 1959, P.L. 1779 and its amendments
30 P.S. Section 1. et seq., for Permitting & allowing a substance deleterious,
destructive, or poisonous to fish, aquatic organisms, amphibians & reptiles, to flow, run, wash, or be emptied into waters of this Commonwealth.

Penalty $500.00
Costs (if any) — 0 —
Total $500.00

This receipt approved by Pennsylvania Fish Commission.

Ralph W. Abele
Executive Director

Not valid unless countersigned by Waterways Patrolman or Salaried Officer of Pennsylvania Fish Commission.

Guy H. Brewer
Waterways Patrolman WPSE-46

AR100090

Mr. J. A. KING

COMMONWEALTH OF PENNSYLVANIA

DEPARTMENT OF ENVIRONMENTAL RESOURCES
1875 New Hope Street
Norristown, Pennsylvania 19401
215 631-2409

April 3, 1978

Mr. J.A. King
Firestone Tire and Rubber Company
Pottstown Plant
Box 699
Pottstown, PA 19464

Dear Mr. King:

Thank you for bringing to my attention the error in my March 8, 1978 letter regarding a settlement payment for the oil spill which occurred on February 14, 1978.

In paragraph 6 of my letter I state that the Department "agrees to waive any further administrative or criminal action . . .", the word criminal was mistakenly inserted. The sentence should read, "upon receipt of the penalty payment checks, to this office, by April 7, 1978, the Department agrees to waive any further administrative or civil actions against Firestone for the February, Schuylkill River oil spill."

The reason the Department does not waive criminal penalties is we do not believe it to be authorized or proper to threaten criminal action to obtain civil penalties or remedies and consequently, the Department will not waive its authority to bring such proceedings upon payment of a civil penalty. The civil fine acts as settlement only of civil and administrative causes of action. Of course, the Department considers the good faith of a company to be a critical factor in the decision of whether to pursue criminal sanctions, and at the present time the recent actions of your Company, including its willingness to implement oil spill clean-up measures on the Schuylkill River militates against our initiating criminal remedies. This is different, however, than our waiving that ability formally.

I am sorry for the inconvenience the error in my March 8, 1978 letter has caused. Thank you for your interest and assistance in resolving this matter. If you have any further questions, please do not hesitate to contact me.

Very truly yours,

Donald F. Knorr

Donald F. Knorr
Environmental Protection Specialist

cc: J. Feola
Ce Re 30

Firestone
PLASTICS COMPANY

TELEPHONE: 215-326-2000

March 30, 1978

Mr. D. Knorr
Dept. of Environmental Resources
1875 New Hope Street
Norristown, Pa. 19401

Dear Mr. Knorr:

Enclosed is the $500.00 payment you suggested for the "Clean Water Fund" in your letter of March 8, 1978 for settlement of the oil discharge incident, without permit, from the Firestone Tire & Rubber Co. to the Schuylkill River on February 11, 1978.

As we discussed on the phone, an equal payment for the "Penna. Fish Commission Fish Fund" will be made directly to that agency represented by Mr. G. Bowersox.

We will appreciate receiving a written waiver of any further administrative or civil actions by the Dept. of Environmental Resources against the company for the February oil discharge as we also discussed and you agreed on the phone.

Sincerely yours,

J. A. King, Coordinator
Special Projects

JAK/rm
Enclosure - Check $500.00
cc: Mr. G. Bowersox, Penna. Fish Commission

Bl cc: Mr. H. S. Newman
Mr. T. C. Walker
Mr. R. K. Johnson
Mr. C. J. Kleinert
Mr. G. W. Wamsley
Mr. T. I. Velock, Akron
Mr. J. R. Laman, Akron
Mr. R. M. Walter, Akron
Mr. S. W. String, Akron
Mr. J. D. Clark, Akron

AR100092

COMMONWEALTH OF PENNSYLVANIA

DEPARTMENT OF ENVIRONMENTAL RESOURCES

1875 New Hope Street
Norristown, Pennsylvania 19401
215 631-2407

RECEIVED
APR 19 1978

April 18, 1978

Mr. J.A. King, Coordinator
Special Projects
Firestone Tire & Rubber Company
Box 699
Firestone Boulevard
Pottstown, PA 19464

Re: Industrial Waste
Firestone Tire & Rubber Company
Lower Pottsgrove Township
Montgomery County

Dear Mr. King:

Thank you for your letter dated March 30, 1978 transmitting the $500.00 payment to the Pennsylvania Clean Water Fund requested in our letter of March 8, 1978. As per your request, enclosed find a written waiver of any further administrative or civil action by the Department of Environmental Resources against Firestone Tire & Rubber Company for the oil spill which occurred between February 11 and February 14, 1978.

Very truly yours,

William H. Jolly, III
Environmental Protection Specialist
Compliance

ENCLOSURE

CC: G. Bowersox, PA Fish Commission
Donald Knorr
Ce Re 30

WHJ:mj

4/20/78

PC's -

Mr. H. S. Newman
Mr. T. C. Walker
Mr. C. J. Kleinert
Mr. G. W. Wamsley
Mr. J. A. King
Mr. T. I. Veiock, Akron
Mr. J. R. Laman, Akron
Mr. R. M. Walter, Akron
Mr. S. W. String, Akron
Mr. J. D. Clark, Akron

Orig. to Mr. R. K. Johnso

AR100093

RELEASE

KNOW ALL MEN BY THESE PRESENT that the Commonwealth of Pennsylvania, by its Department of Environmental Resources, for and in consideration of a $500.00 civil penalty paid to the Clean Water Fund, by Firestone Tire and Rubber Company, receipt whereof is hereby acknowledged, does hereby remise, release and forever discharge Firestone Tire and Rubber Company, its parents, subsidiaries, affiliates, officers, directors, shareholders, agents and employees, and their successors and assigns, of and from any and all manner of civil actions and causes of action, civil fines or penalties, debts, dues, accounts, bonds, judgments, and claims whatsoever in law or equity arising out of a series of one or more spill incidents that occurred or is alledged to have occurred at the Pottstown Plant of Firestone Tire and Rubber Company in Lower Pottsgrove Township, Montgomery County, commencing on February 11, 1978 and continuing through February 14, 1978, or in any way arising therefrom, or from the waste discha inspections and inspection reports relating to said spill, which against the said Firestone Tire and Rubber Company, the Commonwealth of Pennsylvania now has, as a result of said claims, or which it successors or assigns, or any of them, hereafter can, shall or may have for or by reason of any cause, nature, or thing whatsoever arising from such incidents.

IN WITNESS WHEREOF, a duly authorized officer or employee of the Department of Environmental Resources of the Commonwealth of Pennsylvania has hereunto set his hand and seal this 18th day of April, 1978.

COMMONWEALTH OF PENNSYLVANIA

DEPARTMENT OF ENVIRONMENTAL RESOURCES

Attest:

Wilbur P. Stender

By: William H. Valentine

WILBUR P. STENDER, Notary Public
Norristown Boro, Montg. Co.
My Commission Expires Nov. 2, 1981

AR100094

REGISTERED MAIL

November 28, 1978

Commander, Third Coast Guard District
Building 135, Room 310
Governors Island, N. Y., N. Y. 10004 212-668-7108

Attn: Collection Clerk:

Dear Sir:

Ref.: 78-02-13/6/0031, MISD #147-79

Enclosed is a check for $1000.00 in payment of a civil penalty assessed by Commander J. M. Mullen, Chief, Marine Environmental Protection Branch, for an oil spill on February 11, 1978, from the Firestone Tire and Rubber Co., Pottstown, Pa. into the Schuylkill River.

Formal notice of assessment of the penalty was given in Commander Mullen's letter of November 14, 1978.

Very truly yours,

J. A. King, Coordinator
Special Projects

JAK/rm
Enclosure
cc: Mr. J. J. McCoskey

AR100095

DEC 7 1978

J. A. KING

12/7/78 pc to Mr. J.A.King File:Ecology,oil spill

DEPARTMENT OF TRANSPORTATION
U.S. COAST GUARD CG-7688 (REV. 3-67)
Form approved by Comptroller General, U.S.
June 13, 1950

COLLECTION RECEIPT

DATE: 12/1/78

№ 933612

RECEIVED FROM: Firestone Plastics Company
Box 699, Firestone Blvd.
Pottstown, Pa. 19464

(RECEIVER) Third CG District
New York, N.Y.

THE SUM OF One Thousand and - 00 /100 DOLLARS $ 1,000.00

PURPOSE OF COLLECTION:
Payment of Penalty Case 78-02-13/6/C031 MMSD# 147-79

REMITTANCE BY:	NUMBER	AMOUNT	CREDIT	
	~~165582~~	1,000.00	APPROPRIATION OR FUND SYMBOL	ACCOUNT CLASSIFICATION
CHECK			69X5168	2339
P. O. M. O.				
CASH	XXXXXXXXXX			
DEPOSIT MADE BY:	NUMBER	DATE		
C/D FORM	754319	12/1/78		

R.F. Ballard alt Collection Clerk
NAME AND TITLE OF RECEIVING OFFICER ~~District~~

☆GPO 715-779

28

AR100096

Firestone Tire and Rubber Company, intending to be legally bound, hereby agrees to the terms and conditions of this Agreement.

FOR: FIRESTONE TIRE AND RUBBER COMPANY

May 22, 1980
DATE

BY: D. E. Powell

May 22, 1980
DATE

WITNESS: Joseph A. King

cc: Abatement and Compliance
File 46-125
3I93

ENCLOSURE

(Baghouse, #4 Boiler)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
1875 New Hope Street
Norristown, PA 19401
215 631-2415

May 7, 1980

Mr. Joseph A. King
Coordinator, Special Projects
Firestone Tire and Rubber Company
P.O. Box 699
Pottstown, PA 19464

Dear Mr. King:

This letter agreement is made between the Commonwealth of Pennsylvania, Department of Environmental Resources ("Department") and the Firestone Tire and Rubber Company ("Firestone"), an Ohio corporation qualified to do business in the State of Pennsylvania and which is doing business at its plant in Lower Pottsgrove Township, Montgomery County, Pennsylvania.

Firestone owns and operates a tire production facility which includes the use of a tire eccentricity detection and correction device ("No. 13 CARE Machine").

Between April 15, 1976 and September 25, 1979, visible emissions from No. 13 CARE Machine exceeded limits allowed under Section 123.41, Chapter 123 of the Rules and Regulations of the Department.

On September 25, 1979, Firestone completed corrective work on No. 13 CARE Machine resulting in its compliance with applicable visible emissions regulations. The Department has agreed to forego litigation or other enforcement of Section 123.41 of the Rules and Regulations of the Department, 25 PA Code, Chapter 123 for the period April 15, 1976 to September 25, 1979, in consideration of Firestone's corrections and in consideration of payment by Firestone to the Clean Air Fund of Pennsylvania as more fully stated below.

Agreement on the part of Firestone to make the payment and corrections to the No. 13 CARE Machine and agreement on the part of the Department to forego enforcement of its Rules and Regulations were made in an effort to settle the dispute between the parties in an amicable manner without trial or adjudication of any issue or fact of the law, and the parties expressly agreed that this agreement shall not constitute an admission on either part with respect to any issue of fact or law.

Firestone Tire and Rubber Company, intending to be legally bound, hereby agrees to the terms and conditions of this agreement.

FOR: FIRESTONE TIRE AND RUBBER COMPANY

May 16, 1980
DATE

BY: H E Powell
Manager, Pottstown Tire Plant

May 16, 1980
DATE

WITNESS: Joseph A. King
Coordinator, Special Projects

cc: Abatement and Compliance
File 46-125
LL12/.2

KWS:smc

AR100099

(#13 CARE Machine)

ER-AQ-3: Rev. 10/79

May 29, , 1980

TRANSMITTAL OF PENALTY PAYMENT

PAYABLE TO: COMMONWEALTH OF PENNSYLVANIA

MAILING ADDRESS: Pa Department of Environmental Resources
Bureau of Air Quality Control
P.O. Box 2063 -- 18th Floor Fulton Building
Harrisburg, PA 17120
c/o Mr. M. Robinson, Director of Admin. Services

FROM: Firestone Tire & Rubber Co.
(Company)

Box 699

Pottstown, Pa. 19464

RE: Settlement Agreement with --

Company: Firestone Tire & Rubber Co.

Plant: Pottstown

Township: Lower Pottsgrove

County: Montgomery

Date: May 27, 1980
(Agreement Entered Into)

As required by the above agreement, a payment in the amount of $ 2,000.00 is enclosed.
(#13 CARE machine)

Joseph A. King
(Signature)

Coordinator, Special Projects
(Title)

ENCL.

cc: Mr. R. Kona
Dept. of Envir. Resources
1375 New Hope St.
Norristown, Pa. 19401

AR100100

bbc: Mr. F. Ginder
Mr. J. J. McCoskey

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
1875 New Hope Street
Norristown, PA 19401
215 631-2415

May 7, 1980

RECEIVED
MAY 29 1980
J. A. KING

Mr. Joseph A. King
Coordinator, Special Projects
Firestone Tire and Rubber Company
P.O. Box 699
Pottstown, PA 19464

Dear Mr. King:

This letter agreement is made between the Commonwealth of Pennsylvania, Department of Environmental Resources ("Department") and the Firestone Tire and Rubber Company ("Firestone"), an Ohio corporation qualified to do business in the State of Pennsylvania and which is doing business at its plant in Lower Pottsgrove Township, Montgomery County, Pennsylvania.

Firestone owns and operates a tire production facility which includes the use of eleven tire uniformity optimization machines ("TUOs").

At various times between June 26, 1978 and February 1, 1980, visible emissions from the TUOs exceeded limits allowed under Section 123.41, Chapter 123 of the Rules and Regulations of the Department.

On February 1, 1980, Firestone completed the installation of grind rate controls on Nos. 1, 2, 3 and 4 TUOs, resulting in their compliance with applicable visible emissions regulations. Nos. 5, 7, 8, 9, 10, 11 and 12 TUOs were taken out of service permanently by February 1, 1980. The Department has agreed to forego litigation or other enforcement of Section 123.41 of the Rules and Regulations of the Department, 25 Pa. Code, Chapter 123 for the period June 26, 1978 to February 1, 1980, in consideration of Firestone's corrective work and in consideration of payment by Firestone to the Clean Air Fund of Pennsylvania as more fully stated below.

Agreement on the part of Firestone to make payment to the Clean Air Fund of Pennsylvania and to make corrections to the TUOs, and agreement on the part of the Department to forego litigation of its Rules and Regulations, were made in an effort to settle the dispute between the parties in an amicable manner without trial or adjudication of any issue of fact or law, and the parties expressly agreed that this agreement shall not constitute an admission on either part with respect to any issue of fact or law.

IT IS AGREED, THEREFORE, AS FOLLOWS:

1. Firestone shall, on and after February 1, 1980, make the TUOs at its Pottstown plant conform to the requirements of the Pennsylvania Air Pollution Control Act and Chapter 123 of the Rules and Regulations of the Department and shall thereafter continue to operate the TUOs in compliance with said Act and Regulations and all other Air Resources Regulations of the Department.

ER-AQ-3: Rev. 10/79

May 29, 19 80

TRANSMITTAL OF PENALTY PAYMENT

PAYABLE TO: COMMONWEALTH OF PENNSYLVANIA

MAILING ADDRESS: Pa Department of Environmental Resources
Bureau of Air Quality Control
P.O. Box 2063 -- 18th Floor Fulton Building
Harrisburg, PA 17120
c/o Mr. M. Robinson, Director of Admin. Services

FROM: Firestone Tire & Rubber Co.
(Company)

Box 699

Pottstown, Pa. 19464

RE: Settlement Agreement with --

Company: Firestone Tire & Rubber Co.

Plant: Pottstown

Township: Lower Pottsgrove

County: Montgomery

Date: May 27, 1980
(Agreement Entered Into)

As required by the above agreement, a payment in the amount of $ 2,000.00 is enclosed.
(TUO machines)

Joseph A. King
(Signature)

Coordinator, Special Projects
(Title)

ENCL.

cc: Mr. R. Kona
Dept. of Envir. Resources
1875 New Hope St.
Norristown, Pa. 19401

bbc: Mr. F. Ginder
Mr. J. J. McCoskey

AR100102

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF SOLID WASTE MANAGEMENT

DATE PREPARED
6/21/81

COMPLIANCE HISTORY

IDENTIFICATION NO.
120202

MODULE NO. 10

COMPLETION OF PART B OF THIS MODULE IS REQUIRED AS A PART OF THE APPLICATION FOR ANY TYPE OF SOLID WASTE MANAGEMENT PERMIT

ATTACH ADDITIONAL SHEETS AS NECESSARY TO ANSWER THE FOLLOWING. DEPENDING UPON THE RESPONSES TO PART "B" AND/OR OTHER INFORMATION AVAILABLE TO THE DEPARTMENT, COMPLETION OF PART "C" MAY BE REQUIRED.

A. Purpose of Module:

1. The purpose of this application module is to assess the applicant's past history of compliance with laws and regulations relating to environmental protection. Failure to provide correct and complete information required herein may result in the denial, suspension, modification, or revocation of your permit.

2. Unless otherwise specified herein, this module applies to compliance history in regard to the following Pennsylvania statutes and the regulations promulgated thereunder:

   a. The Pennsylvania Solid Waste Management Act of July 7, 1980 (Act 97) and its predecessor, the Solid Waste Management Act of July 31, 1968 (P.L. 788, No. 241).

   b. The Clean Streams Law of June 22, 1937 (P.L. 1987, No. 394).

   c. The Air Pollution Control Act of January 8, 1960 (1959 P.L. 2119, No. 787).

   d. The Dam Safety and Encroachment Act of November 26, 1978 (P.L. 1375, No. 325).

   e. The Surface Mining Conservation and Reclamation Act of May 31, 1945 (P.L. 1198, No. 418).

   f. All other Pennsylvania statutes relating to environmental protection and the public health, safety, and welfare.

IN PART B BELOW, LIST THE EMPLOYER IDENTIFICATION NUMBERS OF ALL BUSINESS ENTITIES AND THE SOCIAL SECURITY NUMBERS OF ALL INDIVIDUALS IDENTIFIED

B. Applicant Background Information (to be completed by applicant):

1. State the correct legal name and address of the applicant and the principal place of business in Pennsylvania. See Attach. 1-A

2. Indicate the form of management under which the applicant conducts its business in Pennsylvania (check appropriate box):

Individual	Corporation [X]
Municipality	Limited Partnership
Proprietorship	Other Partnership
	Other Government Agency

3. Complete the following where applicable:

a. If the applicant is a corporation (as indicated in Question B, 2 above), list all principals of the corporation. This shall include the following: corporate officers, members of the board of directors, and principal stockholders which own, hold, or control stock of five percent (5%) or more of a publicly held corporation or ten percent (10%) or more of a privately held corporation.
See Attach. A

b. List and designate the relationship of all parent corporations and subsidiary corporations and their principal places of business in Pennsylvania.
See Attach. 1-A

c. If the applicant is a partnership (as indicated in Question B, 2 above), list the names and addresses of all partners, both general and limited. N/A

d. List the name and affiliation of any other person or organization having an interest in the proposed facility or activity including business associates, contractors, subcontractors, agents, and landowners. N/A

4. List all DER permits currently in effect held by the applicant or any person or organization identified in Question B, 3 above.
See Attach. B.

5. List any solid waste storage, processing, or disposal facility, area, or activity in Pennsylvania which the applicant, or any person or organization identified in Question B, 3, currently owns or operates, or previously owned or operated, but which are not listed under "B" 4. This shall include any solid waste management activities which are no longer permitted or which were never under permit. Provide a separate list to include solid waste facilities outside of Pennsylvania. Include the location(s) of all such facilities, areas, or activities.
See Attach. 1-A

C. Compliance Background Information (to be completed by applicant):

1. Indicate any "Notices of Violation" received from DER in the past one year period in regard to the permitted facilities or activities identified in Question B, 4 above: Include a description of the alleged violation and the disposition thereof.
   See Attach. 1-A
2. Indicate any administrative orders issued by DER pertaining to any of the facilities or activities identified in Question B, 4 above. Include orders issued to the applicant and any persons or organizations identified in Question B, 3. List the dates and nature of the orders issued.
   See Attach. 1-A
3. Indicate any convictions under the statutes listed in Part A to which the applicant or any person or organization identified in Question B, 3 has been subject within the past five (5) years.
   None
4. Indicate any court proceedings in Pennsylvania within the past five (5) years relating to those statutes in Part A to which the applicant or any person or organization identified in Question B, 3 have been a party. Indicate the disposition of those proceedings. Do not include any proceedings identified in Question C, 3 above.
   None
5. Indicate any consent order, consent adjudication, or settlement agreement concerning any solid waste management facility or activity in Pennsylvania entered into within the past five (5) years by the applicant or any person or organization identified in Question B, 3 above.
   None
6. Indicate whether any of the facilities, areas, or activities identified in Question B, 5 were the subject of an administrative order, consent agreement, consent adjudication, settlement agreement, conviction, or permit revocation pursuant to the statutes listed in Part A.
   None
7. Compliance history outside of Pennsylvania: See Attach. 1-A

   a. Indicate any convictions within the past five (5) years relating to violations of state or Federal environmental statutes occurring at, or caused by, a solid waste management facility or activity under the control of the applicant or any person or organization identified in Question B, 3.

   b. Indicate any final administrative orders issued within the past five (5) years relating to the violation of any state or Federal environmental statutes occurring at, or caused by, a solid waste management facility or activity under the control of the applicant or any person or organization identified in Question B, 3.

MAKE SURE THAT ALL OF THE ABOVE QUESTIONS ARE ANSWERED CORRECTLY AND COMPLETELY AND ARE ATTACHED TO THIS MODULE BEFORE COMPLETING THE FOLLOWING SECTION.

I certify that I am K. H. Garner (name) and that I have authority to respond to the above questions on behalf of the applicant, and that the information provided is true and correct to the best of my knowledge, information, and belief.

Signature K. H. Garner

K. H. Garner

Title Works Manager, Pottstown

Sworn to and subscribed to before me this 23rd day of June, 1982

Marguerite H. Nieznay

Notary Public

Sworn to and subscribed before me this 23 day of June 19 82

MARGUERITE H. NIEZNAY, Notary Public
Pottstown, Montgomery Co., PA
My Commission Expires July 23, 1984

AR100106

Per agreement between DER and Occidental, the requirement to list company waste facilities outside Penna. has been waived by DER.

C.1. Notices of Violation received from DER in the past one-year period:

Received NOV Dec. 3, 1981, after hazardous waste inspection on Dec. 2, 1981. Drums containing waste solvents did not have proper Penna. labels. In compliance - Dec. 21, 1981.

Received NOV Dec. 31, 1981 after NPDES inspection on Nov. 9, 1981 Wastewater sample taken at inspection in DER lab was found to exceed NPDES Permit limit for Oil and Grease. In compliance - Nov. 11, 1981.

Received NOV in DER document of settlement agreement on April 27, 1982 after previous discussions and verbal agreements pertaining to emissions to air above limits in 1976 NESHAP Standard for vinyl chloride and in Penna. Clean Air Act for flyash, , SO_2, and opacity. Occidental has agreed to pay a $2500 penalty, but a for a revision of wording in the document in a letter of May 12, 1982. Response from DER is pending.

Received NOV in report of DER landfill inspection on May 20, 1981 Some areas on unused part of landfill had sparse vegetation. Growth was established naturally and compliance was attained by July, 1981.

Received NOV in report of DER landfill inspection on Dec. 2, 1981 Some areas on unused part of landfill had sparse dead vegetation. Variance for winter season was given with recommendation to re-see in the spring. In April an investigation was begun to determine the cause of repeated poor growth. Analyses of soil by the Penna. State University showed need for lime and fertilizer before re-seeding. This will be done by the end of June, 1982 and re-seeding will follow shortly thereafter.

Received NOV in report of DER landfill inspection on April 23, 198 for stormwater carrying flyash off active area of landfill.. Came into compliance on May 14, 1982 after installation of a barrier of hay bales outside a containment trench.

C.2. Administrative Orders issued by DER:

Other than the contained general directive to come into compliance in each NOV listed in C.1. above, there were no other Administrative Orders received.

C.7.
a&b. Compliance history outside Penna.:

Per agreement between DER and Occidental, the requirement for the compliance history outside Penna. has been waived by DER.

3. Applicant Background Information:

1. Legal name and address of applicant:

Occidental Chemical Corporation (formerly Hooker Chemicals & Plastics Corp.
Armand Hammer Boulevard
P.O. Box 699
Pottstown, Penna. 19464
Lower Pottsgrove Township
(215-327-6400)

3.b. Parent company:

Occidental Petroleum Corporation, a California corporation
10889 Wilshire Boulevard
Los Angeles, California

(no place of business in Penna.)

Subsidiary corporations:

Anode Products, Inc., Empl. Ident. No. 95-2991683
Hooker Taft Corporation, Empl. Ident. No. 16-1035423
International Ore & Fertilizer Corp.
Empl. Ident. No. 13-1997262
Occidental Chemical Agricultural Products, Inc.
Empl. Ident. No. 74-1757276
OMF Calif., Inc., Empl. Ident. No. 38-1968524

5. Solid waste facilities and activities in Penna.:

Occidental Chemical Corporation (formerly Hooker Chemicals & Plastics Corp.) currently owns and operates a solid waste disposal facility, a landfill, on the Pottstown site. Hooker Chemicals & Plastics Corp. purchased the entire site on December 1, 1980 from the Firestone Tire & Rubber Co. of Akron, Ohio. Under Firestone ownership, the landfill was operated under DER Permit #300001 issued Sept. 1, 1977.

Occidental Chemical Corporation, Pottstown, is currently a Generator of Corrosive hazardous waste and spent solvents having Hazardous Waste numbers F003 and F005, as defined in the Penna. Hazardous Waste Management regulations. The site's hazardous waste ID No. is PAD002334753.

Corrosive waste is detoxified on site in a pH neutralization process approved by DER on Sept. 1, 1981 as having satisfied the requirements for an Interim Status Permit for operation of a Hazardous Waste Treating Facility.

Spent hazardous waste solvents are shipped to an off-site reclaimer and off-site treatment facility. Transporter I.D. Nos. are NJT000 009 027 and NJD002 454 544. Reclaimer I.D. No. is NJD002 454 544, Marisol Inc., N.J. Treating Facility I.D. No. is NJD 063 288 239, Rollins Envir. Services, N.J.

ATTACHMENT A

OCCIDENTAL CHEMICAL CORPORATION

DIRECTORS AND OFFICERS

Directors

G. H. Watkins	1980 Post Oak Blvd. Houston, TX 77056
T. R. Harrison	1980 Post Oak Blvd. Houston, TX 77056
K. A. McGaw	1980 Post Oak Blvd. Houston, TX 77056

Officers

Name	Title	Address
G. H. Watkins	President	1980 Post Oak Blvd. Houston, TX 77056
T. S. Farmer	Group Vice President	1980 Post Oak Blvd. Houston, TX 77056
J. F. Riordan	Group Vice President	345 Third Street Niagara Falls, NY 14303
W. J. Wetzel	Group Vice President	1980 Post Oak Blvd. Houston, TX 77056
N. Alpert	Vice President	4060 Lower River Road Youngstown, NY 14174
G. B. Berry	Vice President	21441 Hoover Road Warren, MI 48089
R. B. Casriel	Vice President & Treasurer	10889 Wilshire Boulevard Los Angeles, CA 90024
S. P. Dominick	Vice President	P. O. Box 699 Pottstown, PA 19464

* Business Address

ATTACHMENT A

Name	Title	Address
J. J. Dorgan	Vice President	10889 Wilshire Boulevard Los Angeles, CA 90024
K. R. Ewing	Vice President	345 Third Street Niagara Falls, NY 14303
R. F. Gervais	Vice President	P. O. Box 699 Pottstown, PA 19464
R. E. Goldsberry	Vice President	32100 Stephenson Highway Madison Heights, MI 48071
T. R. Harrison	Vice President & Controller	1980 Post Oak Blvd. Houston, TX 77056
P. C. Hebner	Vice President & Asst. Secretary	10889 Wilshire Boulevard. Los Angeles, CA 90024
J. L. Hurst	Vice President	345 Third Street Niagara Falls, NY 14303
T. L. Jennings	Vice President	Walck Road North Tonawanda, NY 14120
R. A. Lurcott	Vice President	106 Chapel Woods Williamsville, NY 14221
J. J. McCoskey	Vice President	P. O. Box 699 Pottstown, PA 19464
K. A. McGaw	Vice President & Secretary	1980 Post Oak Blvd. Houston, TX 77056
D. F. Pollart	Vice President	345 Third Street Niagara Falls, NY 14303
D. W. Powers	Vice President	P. O. Box 699 Pottstown, PA 19464
R. Rajaji	Vice President & Asst. Controller	114 Belvoir Road Williamsville, NY 14221

ATTACHMENT A

J. D. Tinkler	Vice President	4620 Wayne Road Corona del Mar, CA 92625
J. E. Dahse	Asst. Secretary	1980 Post Oak Blvd. Houston, TX 77056
S. M. Eisner	Asst. Secretary	10889 Wilshire Blvd. Los Angeles, CA 90024
F. J. Kestler	Asst. Secretary	21441 Hoover Road Warren, MI 48089
A. E. Kluegel	Asst. Secretary	32100 Stephenson Highway Madison Heights, MI 48071
W. A. Lindsay	Asst. Secretary	1980 Post Oak Blvd. Houston, TX 77056
R. D. Luss	Asst. Secretary	11 Schimwood Drive Getzville, NY 14068
J. A. Mack	Asst. Secretary	P. O. Box 699 Pottstown, PA 19464
R. R. Marquardt	Asst. Secretary	428 Church Street Youngstown, NY 14174
B. J. McNamee	Asst. Secretary	1980 Post Oak Blvd. Houston, TX 77056
R. P. Mueller	Asst. Secretary	32100 Stephenson Highway Madison Heights, MI 48071
M. J. Rudick	Asst. Secretary	209 Woodbridge Buffalo, NY 14214
S. L. Shaw	Asst. Secretary	3496 Sandy Beach Road Grand Island, NY 14072
J. F. Tao	Asst. Secretary	345 Third Street Niagara Falls, NY 14303
T. O. Waters	Asst. Secretary	1980 Post Oak Blvd. Houston, TX 77056

* Business Address

POTTSTOWN PERMITS

ATTACHMENT B

OCCIDENTAL CHEMICAL CORPORATION

				EXPIR
AIR:				
PVC PLANT:				
#3 SPR DRYR	OPER.	DER	46-319-005	5/31/83
#4 SPR DRYR	OPER.	DER	46-319-006	5/31/83
VCM RECIN.	OPER.	DER	46-319-007	5/31/85
FAB. PROD. PLANT:				
BLENDERS, DUST COLL.	OPER	DER	46-313-010	5/31/85
DI DP TK, DUST COLL/ESP	OPER	DER	46-314-006	5/31/85
COMMON SVCS:				
#4 BOILER	OPER.	DER	46-302-098	5/31/83
#5 BOILER	CONSTR.	DER	APPLIC'N SUBMITTED	2/3/82
WATER:				
EFFLUENTS:				
TO RIVER: NPDES	DER	DER	PA 0010944	3/15/82
TO RIVER DRBC	DRBC	DRBC	APPROVED 4/14/81	NO EXP'N
TO RIVER NPDES	RENEWAL	DER	APPLIED 3/9/82	
TO RIVER WAT QUAL MGMT		DER	4675212-TI	NO EXP'N
INTAKE: FROM RIVER		DRBC	APPROVED 4/14/81	NO EXP'N
INTAKE FROM WELLS		DRBC	REGIS'D NINE 6/26/81	NO EXP'N

EPA

POTENTIAL HAZARDOUS WASTE SITE
TENTATIVE DISPOSITION

REGION	SITE NUMBER
3	PA-588

File this form in the regional Hazardous Waste Log File and submit a copy to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force *(EN-335)*; 401 M St., SW; Washington, DC 20460.

I. SITE IDENTIFICATION

A. SITE NAME	B. STREET	
Occidental Chemical (Previously Firestone)	Armand Hammer Blvd	
C. CITY	**D. STATE**	**E. ZIP CODE**
Lower Pottsgrove Twp (Montgomery Co.)	PA	19464

II. TENTATIVE DISPOSITION

Indicate the recommended action(s) and agency(ies) that should be involved by marking 'X' in the appropriate boxes.

RECOMMENDATION	MARK 'X'	ACTION AGENCY			
		EPA	STATE	LOCAL	PRIVATE
A. NO ACTION NEEDED -- NO HAZARD					
B. INVESTIGATIVE ACTION(S) NEEDED *(If yes, complete Section III.)*	X	X			
C. REMEDIAL ACTION NEEDED *(If yes, complete Section IV.)*					
D. ENFORCEMENT ACTION NEEDED *(If yes, specify in Part E whether the case will be primarily managed by the EPA or the State and what type of enforcement action is anticipated.)*					

E. RATIONALE FOR DISPOSITION

Considering history of site, low priority SI justified. However, this is apparently a RCRA facility, therefore copy of PA sent to RCRA enforcement.

F. INDICATE THE ESTIMATED DATE OF FINAL DISPOSITION *(mo., day, & yr.)*	G. IF A CASE DEVELOPMENT PLAN IS NECESSARY, INDICATE THE ESTIMATED DATE ON WHICH THE PLAN WILL BE DEVELOPED *(mo., day, & yr.)*

H. PREPARER INFORMATION

1. NAME	2. TELEPHONE NUMBER	3. DATE *(mo., day, & yr.)*
Douglass Hill	8541	5/10/85

III. INVESTIGATIVE ACTIVITY NEEDED

A. IDENTIFY ADDITIONAL INFORMATION NEEDED TO ACHIEVE A FINAL DISPOSITION.

B. PROPOSED INVESTIGATIVE ACTIVITY *(Detailed Information)*

1. METHOD FOR OBTAINING NEEDED ADDITIONAL INFO.	2. SCHEDULED DATE OF ACTION *(mo, day, & yr)*	3. TO BE PERFORMED BY *(EPA, Contractor, State, etc.)*	4. ESTIMATED MANHOURS	5. REMARKS
a. TYPE OF SITE INSPECTION (1)				
(2)				
(3)				
b. TYPE OF MONITORING (1)				
(2)				
c. TYPE OF SAMPLING (1)				
(2)				